

# Code of Conduct / Antitrust Policy

## MIDAS Ireland

**The Company objective is to represent the Micro-Nano electronics sector in Ireland; to supply support services to that sector which include the building of an innovation cluster through; managed networking, the dissemination of information and collaborative engagement, sector skill enhancement and talent supply, and representation to government in relevant policy issues.**

### Principles of Conduct

- We will seek to achieve the highest standards and will offer our services honestly and honourably in a fair manner, and encourage our member companies and stakeholders to do the same.
- We shall behave in a professional manner and will respect the reputation of our sector and the other organisations with which we liaise.
- We will undertake to promote co-operation within the sector or sectors in which we work, and between members and suppliers. In doing this, we will seek to identify and apply good practice.
- We will commit to improving the performance and reputation of the sector or sectors in which we work.
- We will endeavour to maintain and improve the quality of our work through constant review of our aims, activities and outcomes, and the cost-effectiveness of every activity.
- We will follow the rules of any public body to which we make representation and, where appropriate, seek guidance from the public body on any rules of relevance.
- We will pay our bills promptly and encourage the same of our members and suppliers.
- We must ensure that claims for out-of-pocket expenses are made in accordance with agreed procedures.

### Integrity

- We are committed to maintaining the highest degree of integrity in all our dealings with potential, current and past members, as well as other stakeholders.
- We recognise that our member companies may be in direct competition. We will strive to avoid showing any preference towards any member company over another, and endeavour to maintain an independent position in our dealings with them.
- We will never offer any financial or other inducement, including direct and indirect payments, offers of employment or substantial gifts or entertainment, to any member, prospective member or holder of public office in an attempt to influence any decision-making process which may affect our organisation or our industry in any way.
- We will not act in a way to gain financial or other benefits for ourselves or for any persons connected to us, such as family, friends, or any organisation that we own, manage or work for.
- We must not accept gifts and hospitality that might reasonably be thought to influence us in carrying out our roles.

## **Transparency and Openness**

- We are clear and precise about our identity and any industry or sector that we may represent.
- We will endeavour to represent the common interests of all members.
- Where there is diverging opinion within the membership, we will seek to present a balanced case respecting the different interests involved. Where appropriate we will work with non-members and other associations in allied sectors on matters of joint concern.
- We will clearly declare any relevant financial or other links to other positions in order to ensure that he or she is protected from any potential conflict of interest.
- We will use reasonable endeavours to ensure the truth and accuracy of any statements made or information provided to any third party in order to never knowingly make false or misleading claims or misrepresent the views of others.

## **Confidentiality**

- We will always try to maintain commercial confidentiality, and protect all personal information received in the course of providing business services.
- We shall take reasonable endeavours to safeguard the confidences of all members and past members and shall not disclose these confidences to their disadvantage or prejudice unless the member has released such information for public use or has given permission for disclosure.

## **Antitrust**

- We will comply with all applicable antitrust laws. Under no circumstances will we directly or indirectly be involved in conduct that leads to or implies an agreement among members that would restrain trade and/or otherwise violate antitrust laws. Any conduct by MIDAS officers, directors, or employees that is contrary to antitrust laws is contrary to MIDAS policy.
- We will ensure that all relevant MIDAS Volunteers and staff must be made aware of conduct that is in violation of the Antitrust Laws.
- We will always ensure that steps taken are consistent with this policy to ensure that MIDAS officers, directors, or employees do not violate antitrust laws at MIDAS activities and, if such violations do occur, that they are promptly reported so that appropriate measures can be taken to protect MIDAS, its volunteers and staff from incurring criminal and civil liability under the laws.
- We will ensure that all relevant competition laws are respected by our members in their dealings with us and each other, where such dealings have been facilitated by us.

## **Discriminatory Conduct**

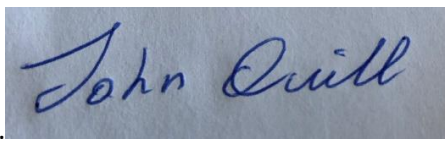
- We will strive to take reasonable care that all professional duties are conducted without causing offence on the grounds of gender, race, religion, disability, or any other form of discrimination or unacceptable reference.

We understand, respect, and abide by this Code issued by MIDAS Ireland:

Signed By:  ..... Date: ...21/03/2023.....

(General Manager)

Printed Name: .....Leonard Hobbs.....

Signed By:  ..... Date: 16/3/23.....


(Director)

Printed Name: .....John Quill.....

Signed By: .....  ..... Date: .....22/03/2022.....

(Director)

Printed Name: .....Damien Walsh.....

Signed By:  ..... Date: .22/03/2023

(Director)

Printed Name: .....Joe Moore.....

The following antitrust rules to be shared with directors, employees, volunteers & members.

### **Discussion Rules for MIDAS Activities**

In order to achieve the above Anti-trust Objectives, the following rules are adopted by MIDAS Ireland to govern discussions at all MIDAS activities:

1. Product pricing information shall never be discussed at a MIDAS activity.
2. Any MIDAS activity which may involve issues with antitrust implications, as described in the Antitrust/Competition Law Guidelines, should be approved by MIDAS's Legal team in advance of its occurrence.
3. When attending a MIDAS activity, members should never hold unauthorized sessions on the facilities provided by MIDAS for purposes of discussing with their competitors any of the subjects listed in the Antitrust/Competition Law Guidelines.
4. An agenda should be prepared for each MIDAS activity, and those agendas cleared with MIDAS officer hosting the event. Where the agenda contains possible antitrust issues as described in the Antitrust/Competition Law Guidelines, MIDAS officer is responsible for seeking approval for the agenda by the MIDAS Legal team.
5. It is a violation of the antitrust laws for competitors to agree among themselves not to compete, therefore, discussions of the division of territories or customers or limitations on the nature of business carried on is not permitted at any MIDAS activity.
6. The antitrust laws prohibit boycotts. Discussions relating to boycotts, including but not limited to blacklisting, agreements to refuse to deal with a competitor or supplier is strictly prohibited.
7. No officer, director, employee, member, or volunteer shall make any representation in public or in private, orally or in writing, that states or appears to state, an official policy position of MIDAS without the specific authorization to do so.
8. If the meeting is between MIDAS representatives and those of another organization providing goods and services that compete with or are similar to those provided by MIDAS the restrictions herein apply to those discussions.
9. If a MIDAS officer, director, employee or volunteer is in attendance at a MIDAS activity and discussion occurs which that person believes violates this policy, he/she should immediately request that the discussion stop and ask that the request be noted in the minutes of the meeting. If others continue the discussion, he/she should excuse him/herself and ask that it be noted in the minutes that he/she is leaving the meeting.