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1. Intent and Scope of Code

NSAI is highly regarded by its clients and stakeholders for its fairness and integrity, which are vital to the overall success of the organisation. To maintain this good reputation, it is incumbent on all employees to conduct themselves in a manner that maintains or enhances the good reputation of NSAI.

The Code of Practice for the Governance of State Bodies requires NSAI to have a published Code of Conduct that provides guidance to employees in complying with their obligations (including legal) and the ethical behaviour required in conducting their duties.

NSAI is committed to be honest and ethical in all of its activities and to adhere to the highest accepted standards of corporate governance and places the highest priority on promoting and preserving the health, safety and welfare of its employees and the environment

Each employee is responsible for their own conduct and, while this code provides guidance on the business conduct required by NSAI, common sense, good judgment and ethical behaviour shall be applied to all situations.

Queries regarding business conduct should be directed to the Line Management and/or Director Corporate Services.

2. Objectives and Principles


This Employee Code of Business Conduct sets out basic objectives such as the:

- establishment of an agreed set of ethical principles;
- promotion and maintenance of confidence and trust; and
- prevention of the development or acceptance of unethical practices.

The NSAI Employee Code of Business Conduct is based on obligations and principles that form part of NSAI's business objectives and outline the practices to be adhered to by all employees. The application of these obligations and principles is set out in more detail in the sections which follow.

3. Integrity

The NSAI conducts all business transactions in accordance with best practice. The principle of integrity is that each employee shall be open, truthful, honest and respectful in their dealings connected with or acting on behalf of NSAI.

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Employees shall;

- Not be involved in outside employment/business interests in conflict, or in potential conflict, with the business of NSAI.
- Commit to compete for business/resources vigorously and energetically but also ethically and honestly.
- Conduct purchasing activities of goods/services in accordance with best business practice.
- Claim expenses only as appropriate to business needs and in accordance with NSAI procedures and good practice in the public sector generally.
- Avoid the use of NSAI's resources or time for personal gain, for the benefit of persons/organisations unconnected with the body or its activities or for the benefit of competitors.
- Ensure that NSAI's annual report and financial statements accurately reflect their business performance and are not misleading or designed to be misleading.

4. Conflict of Interest

4.1 General

Employees should avoid external activities which could give rise to a conflict of interest by influencing their business decision making or the discharge of their duties.


4.2 Employees holding "Designated Positions"

(Ref. Appendix 1 - Ethics In Public Office - Attached listing)

Disclosure is required of potential conflicts of interest between the duties of an employee in a designated position (or their connected interests) in connection with NSAI and any outside interest of the employee (or their connected interests).

In this context connected interests may be defined as:

- a) A spouse, parent, brother, sister, child or step-child
- b) A body corporate with which the employee is associated

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- c) A person acting as the trustee of any trust, the beneficiaries of which include the employee or the persons at (a) above or the body corporate at (b) above
- d) A person acting as a partner of the employee or of any person or body who, by virtue of (a) – (c) above is connected with the employee.

Conflicts of interest may arise due to involvement in the decision-making associated with or authorisation of the purchase and sale of goods or services by or to NSAI and all aspects of each such transaction.

A conflict of interest may seem to exist in circumstances where the employee has a connected interest as defined in (a) – (d) above or:

- o Himself/herself carries on a business relationship with that individual, company or firm
- o Holds shares or other ownership or proprietary interest in the company or firm
- o Is either a debtor or creditor of that individual, company or firm
- o Holds any office whether as a Director or advisor or otherwise of such company, whether for remuneration or not
- o Is or has conducted transactions with the individual, company or firm
- o Is aware that NSAI might itself have an interest in the acquisition of property, business or other assets from the connected individual or company.


Each employee shall

- o On appointment to a designated position, in accordance with the provisions of the Ethics in Public Office Acts, furnish to the Secretary to the Board details (in the prescribed format) of any current or planned business interests meeting the criteria set above
- o Immediately inform their line manager and Secretary to the Board of any additional conflict of interest issues, as they arise or are envisaged during the course of his/her employment.

The Secretary to the Board will maintain a confidential register of all such interests, which will be updated annually. Only the Chairperson, Chief Executive and Secretary to the Board will have access to this register. Any queries regarding the appropriateness of disclosure should be directed by the employee to their line manager or the Secretary to the Board.

In circumstances where a conflict of interest is deemed to exist, the employee shall:

- o Ensure that his/her conflict of interest has been appropriately declared and registered
- o Return any documents relating to the issue

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- Absent him/herself during deliberations pertaining to the area in which the employee has an interest

5. Gifts and Entertainment

Giving or receiving corporate gifts, hospitality, preferential treatment or benefits which might affect or appear to affect the ability of the donor or the recipient to make independent judgement on business transactions shall be avoided.

6. Expenses

Employees must ensure that expenses are claimed only as appropriate to the business needs, in accordance with best practice, the governing regulations / guidelines issued by the Department of Finance and NSAI procedures as may be approved by the Board.

7. Loyalty


Employees are required to be loyal and committed to the organisation and fully committed in all its business activities while mindful that the organisation itself must at all times take into account the interests of the primary stakeholder, DBEI.

Employees shall not engage in, or support an outside activity or organisation, which is competing with NSAI.

8. Obligations

Each employee is required to ensure that individually and as a body NSAI discharges statutory and corporate governance obligations. This includes but is not limited to:

- Fulfil all regulatory and statutory obligations imposed on NSAI.
- Comply with detailed tendering and purchasing procedures, as well as complying with prescribed levels of authority for sanctioning any relevant expenditure.
- Observe controls to prevent fraud including adequate controls to ensure compliance with prescribed procedures in relation to claiming of expenses for business travel.
- All employees are required to co-operate with internal audit in the internal audit process.
- Conform with procedures laid down by the Board in relation to conflict of interest situations, including in regard to acceptance of positions following employment and/or engagement by a State body that may give rise to the potential for conflicts of interest and to confidentiality concerns.
- Acknowledge the duty of all to conform to highest standards of business ethics.

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8.1 Legality and Ethics

NSAI is obliged to comply with all relevant Statutory and Regulatory requirements governing its operations and employees shall adhere to this requirement when discharging their duties to NSAI.

All those who hold designated positions of employment in public bodies, prescribed by regulation for the purposes of the Ethics legislation (i.e. the Ethics in Public Office Acts 1995 and 2001), must comply with the relevant provisions of the legislation.

8.2 Information and Confidentiality

Each employee is required to;

- maintain confidentiality around all information, which they obtain in the course of duties, relating to the business of NSAI.
- Comply with relevant statutory provisions (e.g. Data Protection and Freedom of Information legislation).
- Undertake appropriate prior consultation with management, Freedom of Information Officer and/or third parties where, exceptionally, it is proposed to release sensitive information in the public interest.


Employees shall not disclose or appropriate to their own use, or to the use of any third party, at any time during or subsequent to employment by NSAI, any confidential information of NSAI. This includes, but is not limited to:

- Commercially sensitive information (including, but not limited to, future plans or details of major organisational or other changes such as restructuring);
- Personal information; and
- Information received in confidence by NSAI.
- Information of NSAI or any of its affiliates or associates, customers or clients

Employees are prohibited, during and after their period of employment, from:

- Using NSAI information for personal benefit
- Disclosing NSAI information to third parties, including the media, without prior NSAI approval.
- Acquiring confidential information or business secrets by improper means.
- Disclosing any business or trade secrets of NSAI
- On termination of employment each employee is required to return to NSAI all manuals, letters, notes, notebooks, reports and other materials of a confidential nature.

Employees shall not retain documentation secured during their term of employment. Such documentation shall be returned to the line management.

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9. Fairness

The NSAI values and treats all employees, clients, stakeholders, suppliers, potential suppliers and associates equally and is committed to fairness in its business dealings. All employees are required to uphold this policy on fairness in their individual dealings in connection with their office as employees of NSAI.


10. Work/External Environment

NSAI promotes the development of a culture of 'speaking up' whereby employees can raise issues regarding serious wrongdoing in the workplace without fear of reprisal.

Where an employee has concerns that someone within the organisation or connected to it may be involved in illegal or improper activity and practices they should bring such concerns to the attention of their line management or Chief Executive as soon as possible or alternatively raise the matter within NSAI procedures under the Protected Disclosure Act 2014.

11. Application

This policy applies to everyone working for NSAI including NSAI employees at all levels, as well as External Service providers, consultants/contractors, agency workers, casual workers, temporary staff and interns. This policy does not form part of any employee's contract of employment and the organisation may amend it at any time.

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Appendix 1

[S.I. No. 699/2004 - Ethics in Public Office \(Prescribed Public Bodies, Designated Directorships of Public Bodies and Designated Positions in Public Bodies\) Regulations 2004](#)

Public Body	Officer of Body	Designated Positions of Employment	Relevant Authority for the Position
National Standards Authority of Ireland	Secretary of the Board	Secretary of the Board	Chief Executive Officer
		Level PSO / F and higher posts	Secretary of the Board
		Level E posts in Finance; PR and HR	
		- Accountant	
		- IT Manager	
		- Public Relations Officer	
- Purchasing Officer			
		All other positions of employment prescribed by regulation 5 of S.I. No. 699 of 2004	