

Glantreo Mission Statement and Policies
[QOP 11 001]**Mission Statement**

Glantreo provides innovative technological and scientific products, processes and services primarily in the following sectors:

- Medical devices
- Health-care industries,
- Pharmaceutical
- Biotechnology
- Chromatography

Quality Policy

Glantreo is committed to meeting and exceeding the needs of its clients as outlined in its Mission Statement by:

- ☒ On-going investment in the development of its staff's skills.
- ☒ Creating a culture that is characterised by teamwork, mutual respect, dedication and personal initiative.
- ☒ Continually developing its products, technologies and services.
- ☒ Improving and maintaining its equipment and facilities.
- ☒ Maintaining a quality system that meets the needs of both the organisation and our clients.
- ☒ Comply with all regulatory requirements that apply to our business, as well as voluntary codes. We will consider meeting the above as a minimum requirement and, where both technically possible and practicable, we will attempt to exceed them as well as any other requirements which may be determined internally or required by our business partners. These are listed in QR613 System Resources, Legislative Requirements.
- ☒ Glantreo Limited will report on its activities as part of the annual management review.

Our quality management system is based on the International Standard ISO 9001:2015, and we are fully committed to continually improve the effectiveness of our system by means of constant top management review and oversight. Formal management reviews, internal audits, extensive training, and a corrective and preventive action program complement this level of attention. To ensure the integrity of our system, all employees are aware of quality management methods and are supplied with the resources required to ensure that such methods are effective. Both management and staff of Glantreo are committed to this policy and will ensure that it is understood and implemented at all levels in the organisation.

For and on behalf of Glantreo

Signed: 

Dr John Paul Hanrahan (JPH)
Chief Technology Officer & Quality Manager

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[QOP 11 001]**Health and Safety Policy Statement**

This document sets out the Health and Safety Policy of Glantreo and specifies the means provided to achieve that policy. Our objective is to endeavour so far as reasonably practical to provide a safe and healthy work environment for all our employees and to meet our duties to contractors and members of the public who may be affected by our operations. We also endeavour to ensure that our operation is safe, both to the people and the environment outside our immediate control. Conscious of our duties in this respect, we are at all times developing our safety systems so we can contribute to a safer and healthier external environment.

To achieve this goal, Glantreo Limited aims, for occupational health and safety management, are:

- ☑ To develop, maintain, promote and implement an "health and safety" culture and best practice;
- ☑ We are committed to comply with all regulatory requirements that apply to our business, as well as voluntary codes. We will meet regulatory requirements at a minimum and, where both technically possible and practicable, we will attempt to exceed them as well. These are listed in QR613 System Resources, Legislative Requirements.
- ☑ To ensure that an effective safety management structure is in place to implement and maintain health and safety statutory requirements;
- ☑ To have arrangements in place to ensure a systematic approach to the assessment, evaluation and control of hazards and risks;
- ☑ To ensure that all employees are competent in the work they are doing, aware of their personal responsibility, of the standard to be achieved and of the working methods to be followed;
- ☑ To ensure the active participation of employees in identifying hazards and maintaining and improving health and safety performance;
- ☑ To provide and keep records of the continuous health and safety training for all the employees;
- ☑ To manage and conduct work activities in such a way as to prevent any improper conduct or behaviour likely to put the safety, health and welfare of any employee, customer or public at risk;
- ☑ To make available all applicable safety or protection devices (PPE), information, instruction, training and supervision as is necessary to generate a safe place of work;
- ☑ To record, investigate and evaluate any accidents. Accidents deemed serious or dangerous occurrences will be reported to the HSA.
- ☑ To ensure all contractors undertaking work for the Glantreo Limited are competent in terms of health and safety and that their performance is monitored and remedial action taken where required;
- ☑ To monitor performance and regularly review management systems and working practices through internal and external scheduled audits.
- ☑ Health and Wellbeing of our staff is paramount. We facilitate a flexible working environment, allowing staff to have a healthy work-life balance. Family life is important to everyone in Glantreo and we encourage family friendly practises.

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- ☒ Glantreo Limited will report on its Health and Safety activities as part of the monthly and annual management review (please refer to QR541 Change Management H&S Log).

Note - Every employee has a legal duty under the Safety, Health and Welfare at Work Act, 2005 to take reasonable care of the safety, health and welfare of ourselves and of others who may be affected by our acts and omissions at work. It is also the specific duty of any employee to report to their immediate manager any defects in the procedures, systems of work, structure or equipment which might endanger the safety, health or welfare of anyone on site and give the management a reasonable opportunity to correct the situation.

For and on behalf of Glantreo

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Dr John Paul Hanrahan (JPH)

Chief Technology Officer & Quality Manager

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[QOP 11 001]**Environmental Policy Statement**

Glantreo provides innovative technological and scientific products, processes and services. We understand the potential impact of our business, products, services and associated activities have on the environment and recognises the company's responsibility (commensurate with its activities) for the protection of the natural environment.

Consequently, Glantreo is fully committed, wherever practicable, to reduce any adverse effects on the environment, to prevent pollution and to minimise waste and energy consumption as a result of its activities. This will be achieved by the implementation of responsible environmental practices and application of the following commitments, but not limited to:

☑ Legislative Requirements

We are committed to comply with all regulatory requirements that apply to our business, as well as voluntary codes. We will consider meeting the above as a minimum requirement and, where both technically possible and practicable, we will attempt to exceed them as well as any other requirements which may be determined internally or required by our business partners. These are listed in QR613 System Resources, Legislative Requirements.

☑ Use of Substances

We will be responsible in our storage, use, and handling of chemicals and we will investigate the reduction of use of hazardous and toxic chemicals. We will apply with all regulatory requirements in relation with the use, handling, storing, transportation, control and disposal of chemicals. These are listed in QR613 System Resources, Chemical Inventory, and Hazardous Waste Disposal.

☑ Continuous Improvement

The company is committed to reducing the impact of its operations and processes on the environment by a process of continual improvement. Consequently, we will set and review specific environmental and improvement targets (as they are required), monitor progress, clearly define responsibilities, circulate and publish the results. Those activities and targets that can have a significant impact on the environment will be identified when planning and carrying out Company services.

☑ Procurement

We will use a purchasing policy to favour suppliers and contractors that adopt best environmental practises, in order to ensure they achieve at least minimum environmental standards.

We will support and favour use of class A energy efficient equipment, renewable energy systems, recyclable and environmental friendly products where appropriate.

☑ Recycling, Resource and Waste Management

We will continue to promote, develop, and implement waste prevention, reduction, reuse, and recycling in a systematic and cost effective manner (example: efficient use of energy and water, reuse and recycling of packaging and paper as well as recycling of printers' toner). We will use local appropriately regulated waste management contractors to ensure safe management of hazardous and non-hazardous waste generated in accordance with best environmental practice. These are listed in QR613 System Resources, Hazardous Waste Disposal. ERI have a WEEE facility on site and this is used by Glantreo.

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[QOP 11 001]**☑ Promote Environmental Awareness**

We recognise the importance of training and environmental education to all employees; it is essential that staff understand the impact they have as individuals, and the impact their actions have on the environment. We will inform, motivate and train our staff, at all levels, assisting them in order to emphasize individual responsibility and to promote environmental care as an integral part of the business, playing an active role in our commitment. We are also committed to participate actively in environmental discussion groups through industry associations and initiatives to help raise awareness and improve industry wide performance.

We also will encourage the adoption of these principles by suppliers, partners and service providers.

☑ Responsibility

Responsibility for establishing and implementing Glantreo Limited environmental policy rests with top management, as advised by the Quality, Health, Safety and Environmental Manager, who is responsible for developing, documenting, implementing and maintaining a management system complying with the requirements. All employees have a duty to act in accordance with this policy and within the interests of the environment in general.

☑ Reporting

Glantreo Limited will report on its environmental activities as part of the annual management review.

For and on behalf of Glantreo

Signed:



Dr John Paul Hanrahan (JPH)
Chief Technology Officer & Quality Manager

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Ethical Policy Statement

It is the policy of Glantreo Limited that its employees and board members uphold the highest standards of ethical, professional behaviour.

Duty of care

Our services and opinions will always conform to relevant law. Glantreo Limited believe that all businesses and organizations, should avoid causing any adverse effect on the human rights of people in the organizations we deal with, the local and wider environments, and the well-being of society at large.

To that end, these employees and board members shall dedicate themselves to carrying out the mission of this organisation and uphold the following:

- ☑ Glantreo Limited abide by these policies to protect and enhance the moral position of all our stakeholders; directors, staff, customers and suppliers.
- ☑ Glantreo Limited hold paramount the safety, health and welfare of the public and employees and the respect of the Environment in the performance of professional duties;
- ☑ Glantreo Limited act in good governance, with a commitment to no corruption and avoid any conflict of interests.
- ☑ Glantreo Limited act in such a manner as to uphold and enhance personal and professional honour, integrity and dignity.
- ☑ Glantreo Limited treat with respect and consideration all persons, regardless of race, religion, gender, sexual orientation, maternity, marital or family status, disability, age or national origin ;
- ☑ Glantreo Limited engage in carrying out Glantreo's mission in a professional manner, building professional reputations on the merit of services and refrain from competing unfairly with others.
- ☑ Glantreo Limited take great care to be objective in our judgement and opinions, so that issues are never influenced by anything other than the interests of our clients.
- ☑ Glantreo Limited evaluate emerging issues and to conduct themselves with professional competence, fairness, impartiality, efficiency, and effectiveness ensuring our objectives and goals are realistic in a changing environment.
- ☑ Glantreo Limited respect the structure and responsibilities of the board of directors, provide them with facts and advice as a basis for their making policy decisions, and uphold and implement policies adopted by the board of directors;
- ☑ Glantreo Limited exercise whatever discretionary authority they have under the law to carry out the mission of the organisation, avoiding any interest or activity that is in conflict with the conduct of their official duties;
- ☑ Glantreo Limited demonstrate the highest standards of personal integrity, truthfulness, honesty, and determination in all activities in order to inspire confidence and trust to others;

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- ☑ Glantreo Limited respect and protect privileged information to which they have access in the course of their official duties;
- ☑ Glantreo Limited strive for personal and professional excellence and encourage the professional developments of others.
- ☑ Glantreo Limited pay Supplier's in a timely fashion and expect the same value from our Customers.
- ☑ Glantreo Limited will report on adherence to policy as part of the annual management review.

Glantreo's Values

- ☑ Be honest
- ☑ Be professional & ethical
- ☑ Exceed expectations
- ☑ Focus on continuous improvement
- ☑ Focus on quality
- ☑ Pay attention to detail
- ☑ Provide great levels of service
- ☑ Use your initiative
- ☑ Work hard & smart

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Communication's Policy

At Glantreo Limited we ensure that our external, as well as our internal, communications give an accurate account of our overall performance and activities. We also believe that constructive relations with the media are very important, so we strive for full transparency within the confines of legislation and market competition. Further internal communication policies are in the employment manual.

Confidentiality

All information relating to our customers and our business operations is confidential. We are committed to maintaining the highest degree of integrity in all our dealings with potential, current and past clients. We extend the same standards to all stakeholders. We comply with data protection and other regulatory requirements.

Intellectual property and moral rights

We retain the moral rights in, and ownership of, all intellectual property that we create unless agreed otherwise in advance with our clients. In return we respect the moral and intellectual copyright vested

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in our clients' intellectual property. Many aspects of communication are protected by intellectual property rights which are infringed by copying, downloading, uploading, posting, copying, possessing, processing and distributing material from the internet may be an infringement of copyright or of other intellectual property rights.

- ☑ Be courteous at all times, with colleagues, customers, suppliers, and others
- ☑ Communicate directly with person(s) when there is a difference of opinion.
- ☑ Each employee has the responsibility to foster an understanding of others' differences in order to create an environment where those differences contribute to a better organisation.
- ☑ Conservative criticism — that which will improve business by clarifying or instructing — should be welcomed when delivered with respect and tact. Destructive criticism — that which is designed to harm business or another person — is not to be practiced.
- ☑ If unsure, just ask
- ☑ Further communications for Glantreo Limited is in the Employee Manual.
- ☑ Glantreo Limited will report on its activities in communications as part of the annual management review.

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[QOP 11 001]**Social Media Policy**

At present, the only social media platform that Glantreo Limited uses is LinkedIn and Facebook. Staff and students are encouraged to incorporate their profiles on the platform and to link with the company. This is seen as a sub set under communications policy

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[QOP 11 001]**Corporate Social Responsibility (CSR) Policy**

Corporate Social Responsibility is last but not least as there are many parts of our CSR policy integrated into other internal policies. Glantreo Limited wants to contribute to a better society by actively engaging and consulting with stakeholders in a way that goes beyond financial and legal requirements. We add value as a business to our local society by dedicating time to social causes free of charge, in the following ways;

Enhancing the community in which our board, management and staff members and their dependents live, work and grow by. All our staff are involved in different aspects of civic society. We definitely have a sports fanaticism training the next generation. Both John's and Joe engaged in training in their local clubs for hurling, Gaelic football, and soccer. However, we have diversity with Victor being heavily involved in his Church, the Christ Chapel of Grace in Mallow. Shirley is a board member of the children's charity, Saoirse's Foundation and its national children's ambulance service, <https://www.bumbleance.com/>. The charity is dedicated to making positive life impacts for critically and seriously ill children throughout the island of Ireland. Funds are raised to deliver services and supports to these sick children; and we provide guidance, information and support for their families.

1. Improving the skillsets of HPSU startups with [Ignite](#) and [Enterprise Ireland](#)
2. Providing work placement and internship opportunities for students
3. Providing student awards at national events
4. Improving the skillset of local GAA teams, namely [Ballyhooley](#) (U6 GAA & Hurling Girls/ Boys) and [Midleton](#) (U12 GAA & Hurling Girls/ Boys).
5. Improving the skillset of local soccer teams, namely [Avondale](#)
6. Supporting local rugby through sponsorship of [Highfield](#)
7. [Church](#) and related events
8. Supporting children's charity, [Saoirse's Foundation](#) and its national children's ambulance service, <https://www.bumbleance.com/>

For and on behalf of Glantreo

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Chief Technology Officer & Quality Manager

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[QOP 11 001]**General Data Protection Regulation (GDPR) Policy Statement**

This General Data Protection Register (GDPR) policy is a statement from Glantreo to protect the rights and privacy of individuals in accordance with the Data Protection Acts (EU Regulation 2016/679 General Data Protection Regulation (GDPR)). Data Protection is the safeguarding of the privacy rights of individuals in relation to the processing of personal data. The Data Protection Acts confer rights on individuals as well as responsibilities on those persons processing personal data.

Data processing is widely defined under the Data Protection Acts and means performing any operation or set of operations on the information or data, including:

1. Obtaining, recording or keeping data
2. Collecting, organising, storing, altering or adapting the data
3. Retrieving, consulting or using the data
4. Disclosing the data by transmitting, disseminating or otherwise making it available, or
5. Aligning, combining, blocking, erasing or destroying the data

Responsibility to Manage GDPR Requirements

The Data Steward has overall responsibility for the data management, retention and disposal. They report to board of management any investigation, regulatory compliance and requests on a quarterly basis. They manage the 'quarantine folder' structure of files to be deleted. The Data Steward will provide a written report on activities during year for the Management Review including a list of data which needs to be deleted.

Glantreo will administer its responsibilities under the legislation in accordance with the principles outlined in the GDPR Act as follows:

1. Obtain and process information fairly
2. Keep data only for one or more specified, explicit and lawful purposes
Glantreo will keep data for purposes that are specific, lawful and clearly stated and the data will only be processed in a manner compatible with these purposes
3. Use and disclose data only in ways compatible with these purposes
Glantreo will only disclose personal data that is necessary for the purpose/s or compatible with the purpose/s for which it collects and keeps the data
4. Keep data safe and secure
Glantreo will take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of, the data and against their accidental loss or destruction
5. Keep data accurate, complete and up-to-date
Glantreo will put in place appropriate procedures to assist employees in keeping data up-to-date
6. Ensure that data are adequate, relevant and not excessive
Personal data held by Glantreo will be adequate, relevant and not excessive in relation to the purpose/s for which it is kept

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7. Retain data for no longer than is necessary for the purpose or purposes for which they are kept
8. Give a copy of personal data to an individual, on request within 6 weeks.

All Glantreo staff are responsible for complying with this policy and for ensuring compliance with the Data Protection Acts. Failure of an individual to comply with this policy may lead to disciplinary action, up to and including dismissal being taken in accordance with Glantreo's disciplinary procedures (failure of a third-party contractor/subcontractor to comply with this policy may lead to termination of the contract and/or legal action).

All employees are expected to:

1. Acquaint themselves with, and abide by, the rules of Data Protection set out in this Policy
2. Read and understand this policy document.
3. Understand what is meant by 'personal data' and 'sensitive personal data' and know how to handle such data.

The GDPR policy applies to individuals in the following categories;

1. All employees regardless of position, gender type of contract or length of service including managers.
2. Individuals who are not directly employed by Glantreo, but who are employed by contractors (or subcontractors).
3. Potential candidate for employment
4. Previous employees
5. Customer
6. Supplier
7. Any person resident in China
8. Any person resident in Uruguay

People have the following rights:

1. To have their personal data obtained and processed fairly
2. To have personal data kept securely and not illegitimately disclosed to others
3. To be informed of the identity of the Data Steward and of the purpose for which the information is held
4. To get a copy of their personal data
5. To have their personal data corrected or deleted if inaccurate
6. To prevent their personal data from being used for certain purposes: for example, one might want to have the data blocked for research purposes where it is held for other purposes
7. Under Employment Rights, not to be forced to disclose information to a prospective employer. No one can force another person to make an access request, or reveal the results of an access request, as a condition of recruitment, employment or provision of a service. Where vetting for employment purposes is necessary, this can be facilitated where the individual gives consent to the Data Steward to release personal data to a third party.
8. It should be noted that under the Freedom of Information Act 2014, records containing personal information may be released to a third party, where the public interest so requires.

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[QOP 11 001]**Glantreo Sources of Data**

Data sources include the following

Data Type	Financial Data Type
Certificates	Banking Information
Documents	Invoices
Personal	Payslips
Photograph	
Legal documents	
List such as	
Potential Value	
Add	

and the location of their storage is stated below.

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Location of Data	Details
Cloud based storage	Principal Storage Location
Email	Backed up with webhost, a subcontracted IT organisation.
Hardcopy	Converted to Softcopy and stored on cloud. The quality system is electronic, so hardcopies are digitised, and the original returned to owner, destroyed by shredding or in case of legal documents stored under lock and key in the office. The CCO/Data Steward has the key.
List	Cloud based lists, stored in mailchimp
Local drive	Generally not used for personal information. Certain scientific instruments are not connected to the intranet/internet and may need local storage on occasion until transferred to cloud based system.
Website	Contact request forms

Data Retention Policy

In certain circumstances, Glantreo may avail of exemptions from the restrictions in the Data Protection Acts (e.g. disclosure required by law). These exemptions are subject to strict conditions and should only be availed of where authorised by Glantreo' Data Steward. The Glantreo quality system is electronic, so hardcopies are digitised, and the original returned to owner or destroyed by shredding. Glantreo store data for a number of reasons, principally to do business. As many of our customers and parts of the business are in a regulatory environment, it is necessary to store data. There may be incidences when our products or our customers products are involved in a court case. Therefore, Glantreo is in a position to comply with legislation other than GDPR and has justification in storing certain types of data. There are also incidences where certain data is commercially sensitive and related to IP as this is an R&D establishment. The retention policy has been developed based on the business category.

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Category	Data Retention Period (Years)
1. All Employees regardless of position, gender type of contract or length of service including managers.	Indefinitely
2. Individuals who are not directly employed by Glantreo, but who are employed by contractors (or subcontractors.	10
3. Potential Candidate for employment	3
4. Previous Employees	7
5. Previous Customer	10 if gone out of business
6. Customer	Indefinitely, based on industries regulation requirement
7. Supplier	10
8. Any person resident in China	15
9. Any person resident in Uruguay	20

In addition to the above, Glantreo must also adhere to the following:

1. Transfers outside the European Economic Area

The Data Protection Acts restrict the transfer of personal data outside of the European Economic Area (i.e. the EU and Iceland, Liechtenstein and Norway). Special conditions must be met where the country importing the data does not have an EU-approved level of Data Protection law.

2. Marketing/Electronic Privacy Regulations

The Electronic Privacy Regulations 2011 (SI 336 of 2011) lay down detailed rules which must be complied with before contacting data subjects for marketing purposes. Unsolicited direct marketing is one of the main sources of complaint from individuals to the Data Protection Commissioner and anyone who fails to comply with the Electronic Privacy Regulations can be prosecuted by the Data Protection Commissioner. As such, it is imperative that the necessary marketing opt-ins and opt-outs (via a data protection notice or otherwise) are in place before using personal data for marketing purposes.

All current customers have opted in and a GDPR specific newsletter completed with policy will be sent to all customers. Our policy is to opt out and customers are able to unsubscribe at any time from mail sent from Glantreo.

3. CCTV

All usage of CCTV must be undertaken in compliance with the requirements of the Data Protection Acts. Glantreo Limited does not currently have CCTV in use.

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[QOP 11 001]**GDPR Glossary**

Data controllers are those who, either alone or with others, control the contents and use of personal data. Data Controllers can be either legal entities such as companies, Government Departments or voluntary organisations, or they can be individuals such as G.P.s, pharmacists or sole traders, where these individuals keep personal information about their patients, clients, constituents etc..

Data subject is an individual who is the subject of personal data.

Data processors are persons who process personal data on behalf of a data controller (but do not include employees of a data controller who process such data during their employment). Examples of data processors include payroll companies, accountants and market research companies, all of which could hold or process personal information on behalf of someone else.

Personal data means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the Data Steward.

Sensitive personal data receives greater protection under the Data Protection Acts and means personal data relating to:

1. The racial or ethnic origin, the political opinions or the religious or philosophical beliefs of the data subject,
2. Whether the data subject is a member of a trade union
3. The physical or mental health or condition or sexual life of the data subject,
4. The commission or alleged commission of any offence by the data subject, or
5. Any proceedings for an offence committed or alleged to have been committed by the data subject, the disposal of such proceedings or the sentence of any court in such proceedings.