



SUMMARY OF CODE OF ETHICS

Introduction

Irish Residential Properties REIT plc (“**IRES**”) and its subsidiaries from time to time (other than owners’ management companies) (together, the “**Group**” or “**we**”, “**us**” or “**our**”) are committed to achieving and maintaining high standards of integrity and accountability in conducting the business of the Group. In order to ensure such standards are implemented and maintained, IRES has adopted a code of ethics (the “**Code**”) to provide a framework of guidelines and principles to govern and encourage ethical and professional behaviour in conducting its business. The Code is designed to assist directors, officers and employees of the Group, along with the service providers of the Group (together “**representatives**”) to make ethical choices.

The Code provides guidance on the following core areas:

Conflicts of Interest

It is our policy to seek to ensure that all of our dealings with residents, shareholders, contractors, competitors, existing and potential business partners and others are conducted in a manner that avoids actual or potential conflicts of interest. In general, a conflict of interest exists where a representative’s personal or corporate interests interfere with his or her ability to act in the best interests of the Group. Therefore, the Code requires full and timely disclosure of any actual or potential conflict of interest. Proper disclosure provides an opportunity to obtain advice from the appropriate level of management and to resolve actual or potential conflicts of interest in a timely and effective manner.

Scope of Authority

Each representative must act within the scope of his/her duties and delegated authorities.

Protection and Use of the Group’s Assets and Opportunities

All representatives are responsible for protecting the Group’s assets from improper use, including fraud, theft and misappropriation. It is our policy to protect our assets and promote their efficient use for legitimate business purposes. This requires proper documentation (which is timely, accurate and complete) and appropriate use of discretion. The Group has implemented control measures to protect our property, including policies on signing authorities, use of security passwords, and restricted access.

Corporate Opportunities

The benefit of any business venture, opportunity or potential opportunity resulting from a person’s position in the Group may not be appropriated for any improper personal advantage.

Confidentiality of Corporate Information

Information is a key and valuable asset of the Group. Protecting this information is critical to our success and to our reputation for integrity and our relationship with third parties. It is our policy to ensure that our proprietary and confidential information, including proprietary and confidential information that has been entrusted to us by others (including any personal information), is adequately safeguarded. The Code requires that all confidential information, including information about our business, employees, tenants, assets, opportunities and competitors, must be properly protected from advertent or inadvertent disclosure and must only be used for the intended purposes or otherwise in compliance with applicable and regulations. Each representative’s obligation to protect confidential information continues even after his, her or its relationship with the Group has terminated.

Fair Dealing with Other People and Organisations

All business dealings undertaken on behalf of the Group must be conducted in a manner that preserves our integrity and reputation. It is our policy to deal fairly and honestly with third parties and to seek to avoid misrepresentations of material facts, manipulation, concealment or abuse of confidential information or any other illegal or unfair practices.

Complying with the Law

The Group strives to ensure that its business is conducted in all material respects in accordance with all applicable laws, stock exchange rules and securities regulations in all jurisdictions where the Group operates or is subject to regulation. All representatives are required to uphold and comply with all applicable laws and any other requirements established by the Group.

Dealing Policy and Dealing Code

The Group operates a dealing policy and dealing code which are designed to ensure that the directors, employees and certain other persons within the Group, do not abuse, and do not place themselves under suspicion of abusing, inside information and comply with their obligations under the EU Market Abuse Regulation (596/2014).

Reporting of Illegal or Unethical Behaviour

The Group strives to foster a business environment that promotes integrity and deters unethical or illegal behaviour. As a result, the Code requires that any concerns or complaints in this regard must be reported. No person may retaliate against any representative who, acting in good faith, makes a report about an actual or apparent violation of the Code or provides assistance in connection with any investigation. In order to ensure that the reporting of malpractice or illegal acts or omissions is facilitated, the Group has adopted a Whistleblower Policy.

Treat others with Dignity and Respect

We are committed to a work environment in which all persons are treated with dignity and respect. It is our policy to ensure equal treatment, without discrimination or harassment, on the basis of race, color, religion, creed, age, sex, gender, gender identity or expression, sexual orientation, national origin, citizenship, disability, marital and civil partnership or union status or any other characteristic protected by law. We expect that all relationships among persons in the workplace will be business-like and free of bias, harassment and violence. Misconduct, including discrimination, harassment, retaliation or other forms of unprofessional behavior will not be tolerated.

Promote a Safe and Healthy Working Environment

We are committed to conducting our business in compliance with all applicable environmental and workplace health and safety laws and regulations. We strive to provide a safe and healthy work environment for employees and other representatives and to avoid adverse impact and injury to the environment and communities in which we conduct our business. Under the Code, achieving this goal is the responsibility of all representatives.

Contravention of the Code

Contravention of any provision of the Code may result in disciplinary action up to and including dismissal in addition to possible civil, criminal or other legal or regulatory action. We also may report activities to our regulators and/or other legal enforcement agencies or bodies, which could give rise to regulatory or criminal investigations.

Training

The Code is provided to all new employees and training on the issues set out in the Code is provided to staff on an ongoing basis.

Monitoring and Review

The board of directors of the Company monitors compliance with the Code and reviews the Code periodically to ensure that it remains fit for purpose and relevant to those issues facing the Group.