

## Anti-Bribery & Corruption Policy

### JSPC Group LTD

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#### 1. Policy Statement

JSPC Group LTD is committed to conducting all business activities with integrity, transparency, and honesty. We operate a **zero-tolerance approach** to bribery, corruption, fraud, or any form of unethical business conduct.

We recognise that ethical behaviour is essential when operating within the rail industry and maintaining the trust of clients, partners, and the public. In alignment with the expectations of **Network Rail** and **Iarnród Éireann**, JSPC Group LTD prohibits all forms of bribery and corruption in both the public and private sectors.

No person working for or on behalf of JSPC Group LTD may offer, give, request, or accept a bribe or improper advantage under any circumstances.

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#### 2. Scope

This policy applies to:

- All directors, employees, and agency workers of JSPC Group LTD
- All subcontractors, suppliers, consultants, and business partners
- All business activities undertaken on behalf of JSPC Group LTD
- All locations, including rail infrastructure, offices, depots, and client sites

Compliance with this policy is mandatory.

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#### 3. Legal, Standards, and Rail Industry Alignment

This policy is aligned with the following legislation, standards, and industry requirements:

##### United Kingdom – Network Rail Alignment

- **Bribery Act 2010**
- **Network Rail Supplier Code of Conduct**
- **NR/L2/OHS/001 – Safety Management System** (governance, leadership, behaviours)

- Fraud Act 2006

#### **Ireland – Iarnród Éireann Alignment**

- **Criminal Justice (Corruption Offences) Act 2018**
- Ethics in Public Office Acts
- **Iarnród Éireann Supplier and Contractor Requirements**
- **Iarnród Éireann Safety Management System (SMS)**

#### **Best Practice**

- ISO 37001 – Anti-Bribery Management Systems (principles)
  - OECD Anti-Bribery Convention
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#### **4. Definitions**

- **Bribery:** Offering, giving, requesting, or receiving anything of value to improperly influence a decision or action.
  - **Corruption:** Abuse of entrusted power for private gain.
  - **Facilitation payments:** Unofficial payments made to secure or expedite routine actions (prohibited).
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#### **5. Prohibited Conduct**

*(Network Rail Supplier Code of Conduct | IE Corruption Legislation)*

The following activities are strictly prohibited:

- Offering, giving, requesting, or accepting bribes
- Facilitation payments of any kind
- Improper gifts, hospitality, or incentives intended to influence decisions
- Kickbacks, secret commissions, or inducements
- Fraud, false accounting, or misrepresentation
- Any conduct that could compromise impartiality or integrity

These prohibitions apply whether dealing with public officials, clients, suppliers, or private individuals.

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## 6. Gifts and Hospitality

JSPC Group LTD recognises that reasonable hospitality can form part of legitimate business relationships. However:

- Gifts or hospitality must never be intended to influence a business decision
- All gifts and hospitality must be reasonable, proportionate, and transparent
- Cash or cash-equivalent gifts are prohibited
- Gifts or hospitality must be declared in line with company procedures

Where in doubt, gifts or hospitality must be declined.

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## 7. Conflicts of Interest

*(Network Rail Supplier Code of Conduct | IE Ethical Standards)*

All individuals must avoid situations where personal, financial, or other interests conflict—or appear to conflict—with the interests of JSPC Group LTD or its clients.

- Actual or potential conflicts of interest must be declared immediately
  - JSPC Group LTD will manage conflicts transparently and appropriately
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## 8. Responsibilities

### Directors and Senior Management

- Demonstrate leadership and commitment to ethical behaviour
- Ensure effective controls are in place to prevent bribery and corruption
- Promote a culture of openness and accountability

### Managers and Supervisors

- Ensure compliance with this policy
- Remain alert to bribery and corruption risks
- Take appropriate action where concerns arise

### Employees, Agency Workers, and Subcontractors

- Comply with this policy at all times
- Avoid engaging in any form of bribery or corruption
- Report concerns promptly

## **9. Reporting Concerns and Whistleblowing**

*(Network Rail Supplier Code of Conduct | IE Protected Disclosures)*

JSPC Group LTD encourages the reporting of any concerns relating to bribery, corruption, or unethical behaviour.

Concerns may be raised through:

- Line management
- Senior management
- The company's whistleblowing procedure

All reports will be treated confidentially and investigated promptly. Retaliation against anyone raising a concern in good faith will not be tolerated.

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## **10. Due Diligence and Supply Chain**

*(Network Rail & IE Supplier Expectations)*

JSPC Group LTD will:

- Undertake proportionate due diligence on suppliers and business partners
- Require suppliers and subcontractors to operate ethically and lawfully
- Take action where bribery or corruption risks are identified

Failure to meet these standards may result in termination of contracts.

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## **11. Non-Compliance and Disciplinary Action**

Any breach of this policy will be treated as a serious matter and may result in:

- Disciplinary action up to and including dismissal
  - Termination of subcontractor or supplier agreements
  - Removal from Network Rail or Irish Rail sites
  - Reporting to clients or relevant authorities
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## **12. Training and Awareness**

JSPC Group LTD will:

- Communicate this policy to relevant workers and suppliers
  - Provide awareness training where appropriate
  - Reinforce ethical expectations through induction and supervision
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### **13. Review and Continuous Improvement**

This policy will be:

- Reviewed annually
  - Updated to reflect changes in legislation or rail industry requirements
  - Communicated to all relevant parties
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### **14. Approval**

This Anti-Bribery & Corruption Policy has been approved by the Directors of JSPC Group LTD and is effective immediately.

**Signed:**

Director

**JSPC Group LTD**

Date: J. Sands