

Code of Ethical Practice

JSPC Group LTD

1. Policy Statement

JSPC Group LTD is committed to conducting all business activities ethically, responsibly, and with integrity. We recognise that maintaining the highest standards of ethical behaviour is essential when working within the rail industry and in maintaining the trust of our clients, partners, employees, and the public.

In alignment with the principles and expectations of **Network Rail** and **Iarnród Éireann**, JSPC Group LTD requires all employees, subcontractors, and business partners to act honestly, lawfully, and in a manner that upholds public confidence in the rail industry.

This Code sets out the ethical standards and behaviours expected of all those working for or on behalf of JSPC Group LTD.

2. Scope

This Code of Ethical Practice 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 Code is mandatory.

3. Standards, Legislation, and Framework Alignment

This Code is aligned with, and supports compliance with, the following:

United Kingdom

- **Network Rail Supplier Code of Conduct**
- **NR/L2/OHS/001 – Safety Management System** (leadership, behaviours, and governance)
- Bribery Act 2010
- Modern Slavery Act 2015

- Equality Act 2010
- Health and Safety at Work etc. Act 1974

Ireland

- **Iarnród Éireann Supplier and Contractor Standards**
- **Iarnród Éireann Safety Management System (SMS)**
- Ethics in Public Office Acts
- Criminal Justice (Corruption Offences) Act 2018
- Safety, Health and Welfare at Work Act 2005
- Employment Equality Acts

International / Best Practice

- ISO 37001 – Anti-Bribery Management Systems (principles)
- UN Guiding Principles on Business and Human Rights
- International Labour Organization (ILO) Core Conventions

4. Ethical Principles

JSPC Group LTD is committed to the following core ethical principles:

- Integrity and honesty in all business dealings
- Compliance with all applicable laws, rules, and rail industry standards
- Fairness, equality, and respect for individuals
- Transparency and accountability
- Zero tolerance of corruption, bribery, and unethical behaviour

5. Compliance with Laws and Rail Standards

(Network Rail Supplier Code of Conduct | Iarnród Éireann SMS)

All individuals working for or on behalf of JSPC Group LTD must:

- Comply with all applicable UK and Irish laws
- Adhere to Network Rail and Irish Rail rules, standards, and site requirements
- Follow JSPC Group LTD policies and procedures

- Cooperate fully with audits, inspections, and assurance activities
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6. Bribery, Corruption, and Fraud

(UK Bribery Act 2010 | Criminal Justice (Corruption Offences) Act 2018)

JSPC Group LTD operates a **zero-tolerance approach** to bribery, corruption, fraud, or facilitation payments.

The following are strictly prohibited:

- Offering, giving, requesting, or accepting bribes or improper inducements
- Improper gifts, hospitality, or incentives intended to influence decisions
- Fraud, false accounting, or misrepresentation
- Any conduct that could compromise impartiality or integrity

All gifts and hospitality must be proportionate, transparent, and declared in line with company procedures.

7. Conflicts of Interest

(Network Rail Supplier Code of Conduct | IE Ethics Requirements)

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.

- Any actual or potential conflicts of interest must be declared immediately
 - JSPC Group LTD will manage conflicts transparently and appropriately
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8. Fair Treatment, Equality, and Respect

(Equality Act 2010 | Employment Equality Acts | ILO Conventions)

JSPC Group LTD is committed to:

- Treating all individuals with dignity and respect
- Providing equality of opportunity
- Preventing discrimination, harassment, bullying, or victimisation
- Promoting inclusive and respectful workplaces

Discriminatory or abusive behaviour will not be tolerated.

9. Human Rights and Modern Slavery

(Modern Slavery Act 2015 | UN Guiding Principles | Network Rail & IE Expectations)

JSPC Group LTD is committed to respecting human rights and preventing modern slavery and human trafficking.

- Forced, bonded, or involuntary labour will not be tolerated
 - Supply chains must operate ethically and lawfully
 - JSPC Group LTD's **Modern Slavery Policy** applies to all suppliers and subcontractors
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10. Health, Safety, and Ethical Behaviour

(NR/L2/OHS/001 | Iarnród Éireann SMS)

Ethical behaviour includes taking responsibility for health and safety.

All individuals must:

- Act safely and responsibly at all times
- Comply with health and safety rules and procedures
- Challenge unsafe or unethical behaviour
- Stop work where safety or integrity is compromised

Safety will never be compromised for commercial or operational gain.

11. Confidentiality and Data Protection

(UK GDPR | Data Protection Act 2018 | Irish Data Protection Acts)

Individuals must:

- Protect confidential business, client, and personal information
 - Use information only for legitimate business purposes
 - Comply with data protection legislation
 - Not misuse or improperly disclose sensitive information
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12. Reporting Concerns and Whistleblowing

(Network Rail Supplier Code of Conduct | IE Whistleblowing Requirements)

JSPC Group LTD encourages the reporting of:

- Ethical concerns
- Suspected breaches of this Code
- Unsafe, illegal, or dishonest behaviour

Concerns may be raised through line management or the company's whistleblowing procedure.

- Reports will be treated confidentially
- Retaliation against individuals raising concerns in good faith will not be tolerated

13. Non-Compliance and Disciplinary Action

Breaches of this Code may result in:

- Disciplinary action up to and including dismissal
- Termination of subcontractor or supplier contracts
- Removal from Network Rail or Irish Rail sites
- Notification to clients or authorities where required

14. Review and Continuous Improvement

This Code of Ethical Practice will be:

- Reviewed annually
- Updated to reflect changes in legislation, Network Rail, or Irish Rail standards
- Communicated to employees and supply-chain partners

15. Approval

This Code of Ethical Practice has been approved by the Directors of JSPC Group LTD and is effective immediately.

Signed:

Director

JSPC Group LTD

Date: J. Sands