

## Subcontractor Management Policy

### JSPC Group LTD

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#### 1. Policy Statement

JSPC Group LTD is committed to ensuring that all subcontractors and suppliers engaged on our behalf are managed effectively, safely, ethically, and in accordance with contractual, legal, and rail industry requirements.

We recognise that subcontractors form a critical part of the rail supply chain and that robust subcontractor management is essential to maintaining safety, quality, reliability, and compliance. In alignment with the expectations of **Network Rail** and **Iarnród Éireann**, and the principles of **ISO 9001**, JSPC Group LTD operates a structured approach to subcontractor selection, control, monitoring, and review.

Subcontractors will only be engaged where they can demonstrate competence, compliance, and alignment with JSPC Group LTD standards.

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#### 2. Scope

This policy applies to:

- All subcontractors, suppliers, and labour providers engaged by JSPC Group LTD
- All subcontracted activities, including labour supply and support services
- All work undertaken on Network Rail or Irish Rail infrastructure
- All locations including rail infrastructure, depots, offices, 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

- **NR/L2/OHS/001 – Safety Management System**
  - Supply chain control, competence, assurance, monitoring
- **NR/L2/OHS/019 – Safety of People at Work**

- Network Rail Supplier Code of Conduct
- Railway and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS)

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

- **Iarnród Éireann Safety Management System (SMS)**
- Iarnród Éireann Rule Book
- Railway Safety Act 2005
- Iarnród Éireann Contractor and Supplier Requirements

#### **Quality Management – ISO Alignment**

- **ISO 9001:2015**
  - Clause 8.4 – Control of externally provided processes, products, and services
  - Clause 5.1 – Leadership and commitment
  - Clause 7.1 – Resources
  - Clause 9.1 – Performance evaluation

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#### **4. Subcontractor Management Objectives**

*(NR/L2/OHS/001 | IE SMS | ISO 9001 Clause 8.4)*

JSPC Group LTD aims to:

- Ensure subcontractors operate safely, competently, and compliantly
- Prevent harm to people, infrastructure, and the environment
- Maintain consistent quality and service delivery
- Ensure compliance with Network Rail, Irish Rail, and legal requirements
- Promote ethical, responsible, and transparent supply-chain practices

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#### **5. Subcontractor Selection and Approval**

*(ISO 9001 Clause 8.4.1 | NR/L2/OHS/001)*

Before engagement, JSPC Group LTD will ensure subcontractors are:

- Assessed for competence, experience, and capability

- Verified for relevant rail competencies and certifications
- Assessed for health & safety arrangements and performance
- Reviewed for compliance with legal, ethical, and labour requirements
- Approved through a documented subcontractor approval process

Subcontractors will not be engaged without formal approval.

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## **6. Health, Safety, and Rail Compliance**

*(NR/L2/OHS/001 | NR/L2/OHS/019 | IE SMS)*

JSPC Group LTD will ensure subcontractors:

- Comply with Network Rail and Irish Rail rules and standards
- Operate in accordance with JSPC Group LTD Health & Safety policies
- Provide suitable risk assessments and method statements (RAMS)
- Use competent, trained, and medically fit personnel
- Comply with Drugs & Alcohol, Fatigue, and Fitness for Duty requirements

JSPC Group LTD retains overall responsibility for safety where subcontractors operate under its control.

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## **7. Quality Management and Performance Control**

*(ISO 9001 Clause 8.4.2 & 8.4.3)*

JSPC Group LTD will:

- Clearly define subcontracted requirements and expectations
  - Monitor subcontractor performance against agreed criteria
  - Review quality, safety, and service delivery outcomes
  - Address non-conformances and require corrective actions
  - Suspend or remove subcontractors where performance is unacceptable
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## **8. Training, Competence, and Authorisation**

*(NR/L2/OHS/001 | IE SMS | ISO 9001 Clause 7.2)*

Subcontractors must ensure that:

- Personnel are competent for the roles they perform
- Rail competencies, medicals, and certifications are current
- Training records are maintained and made available upon request

JSPC Group LTD may verify competence at any time.

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## **9. Ethical, Legal, and Social Responsibility**

*(Network Rail Supplier Code of Conduct | IE Expectations)*

Subcontractors must comply with:

- Anti-bribery and corruption requirements
- Modern slavery and labour standards
- Equality, diversity, and inclusion principles
- Data protection and confidentiality obligations

Failure to meet ethical or legal standards may result in immediate termination.

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## **10. Incident Reporting and Cooperation**

*(NR/L2/OHS/001 | IE SMS)*

Subcontractors must:

- Report all incidents, near misses, and unsafe conditions immediately
  - Cooperate fully with investigations
  - Implement corrective actions as required
  - Support learning and continuous improvement
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## **11. Monitoring, Audit, and Assurance**

*(NR/L2/OHS/001 | ISO 9001 Clause 9.1)*

JSPC Group LTD will:

- Monitor subcontractor performance through audits and inspections
- Review safety, quality, and compliance performance

- Require evidence of compliance upon request
  - Share relevant findings with Network Rail or Irish Rail where required
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## 12. Records and Documentation

*(ISO 9001 Clause 7.5)*

JSPC Group LTD will maintain records relating to:

- Subcontractor approval and assessments
  - Performance reviews and audits
  - Competence and compliance checks
  - Corrective actions and communications
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## 13. Non-Compliance and Corrective Action

Where subcontractors fail to meet requirements, JSPC Group LTD may:

- Require immediate corrective action
  - Suspend or restrict activities
  - Remove personnel from site
  - Terminate contracts
  - Notify Network Rail or Irish Rail where required
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## 14. Review and Continuous Improvement

*(ISO 9001 Clause 10 | NR/L2/OHS/001)*

This policy will be:

- Reviewed at least annually
  - Updated to reflect changes in **NR/L2 standards, Irish Rail SMS, or ISO 9001**
  - Communicated to all relevant subcontractors and stakeholders
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## 15. Approval

This Subcontractor Management Policy has been approved by the Directors of JSPC Group LTD and is effective immediately.

**Signed:**

Director

**JSPC Group LTD**

**Date:** J. Sands