

Equality, Diversity & Inclusion Policy

JSPC Group LTD

1. Policy Statement

JSPC Group LTD is committed to promoting equality, valuing diversity, and fostering an inclusive working environment where everyone is treated with dignity, fairness, and respect.

We recognise that a diverse and inclusive workforce supports better decision-making, improved safety outcomes, and stronger performance within the rail industry. In alignment with the expectations of **Network Rail** and **Iarnród Éireann**, JSPC Group LTD is committed to eliminating discrimination and promoting equal opportunities in all aspects of employment and labour supply.

Equality, diversity, and inclusion are integral to our values and the way we conduct our business.

2. Scope

This policy applies to:

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

Compliance with this policy is mandatory.

3. Legal, Standards, and Rail Industry Alignment

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

United Kingdom – Network Rail Alignment

- **Equality Act 2010**
- **Network Rail Supplier Code of Conduct**

- **NR/L2/OHS/001 – Safety Management System** (leadership, behaviours, and workforce engagement)
- Network Rail Equality, Diversity & Inclusion Strategy

Ireland – Iarnród Éireann Alignment

- **Employment Equality Acts 1998–2015**
- **Equal Status Acts 2000–2018**
- **Iarnród Éireann Safety Management System (SMS)**
- Iarnród Éireann Equality, Diversity & Inclusion commitments

Best Practice

- ISO 26000 – Guidance on Social Responsibility
- UN Sustainable Development Goals (SDGs)
- International Labour Organization (ILO) Core Conventions

4. Our Commitment

JSPC Group LTD is committed to:

- Providing equality of opportunity in recruitment, employment, and labour supply
- Creating an inclusive working environment free from discrimination, harassment, bullying, or victimisation
- Valuing individual differences and diverse perspectives
- Ensuring fair and transparent employment practices
- Supporting Network Rail and Irish Rail objectives for a diverse rail workforce

5. Prohibited Conduct

(Network Rail Supplier Code of Conduct | IE Equality Legislation)

JSPC Group LTD will not tolerate discrimination, harassment, or unfair treatment on the grounds of:

- Age
- Disability
- Gender reassignment

- Marriage or civil partnership
- Pregnancy or maternity
- Race, nationality, ethnic or national origin
- Religion or belief
- Sex
- Sexual orientation

Any behaviour that undermines dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment is unacceptable.

6. Recruitment, Selection, and Labour Supply

(Equality Act 2010 | Employment Equality Acts)

JSPC Group LTD will ensure that:

- Recruitment and selection processes are fair, transparent, and based on merit
 - No unlawful discrimination occurs at any stage of recruitment or deployment
 - Selection decisions are based on competence, qualifications, and fitness for duty
 - Reasonable adjustments are made for individuals with disabilities, where practicable
-

7. Training, Development, and Progression

JSPC Group LTD will:

- Promote equal access to training and development opportunities
 - Support skills development and career progression
 - Ensure that competence and rail certification requirements are applied consistently and fairly
 - Encourage underrepresented groups to enter and progress within the rail industry
-

8. Dignity, Respect, and Inclusion at Work

(NR/L2/OHS/001 | IE SMS – Workforce Engagement)

All individuals working for or on behalf of JSPC Group LTD are expected to:

- Treat others with dignity and respect
 - Behave professionally and responsibly
 - Challenge inappropriate or discriminatory behaviour
 - Support an inclusive and respectful workplace culture
-

9. Reasonable Adjustments and Accessibility

JSPC Group LTD will, where reasonably practicable:

- Make adjustments to support individuals with disabilities or health conditions
 - Consider flexible working arrangements where operationally feasible
 - Ensure accessibility is considered in employment and labour supply decisions
-

10. Reporting Concerns and Complaints

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

JSPC Group LTD encourages the reporting of any concerns relating to discrimination, harassment, or unfair treatment.

Concerns may be raised through:

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

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

11. Responsibilities

Directors and Senior Management

- Demonstrate leadership and commitment to equality, diversity, and inclusion
- Ensure effective implementation of this policy
- Monitor compliance and drive continuous improvement

Managers and Supervisors

- Apply this policy fairly and consistently
- Promote inclusive behaviours
- Take action where inappropriate conduct is identified

Employees and Workers

- Comply with this policy at all times
 - Treat others with dignity and respect
 - Report concerns or unacceptable behaviour
-

12. Monitoring and Review

JSPC Group LTD will:

- Monitor EDI performance and trends where appropriate
 - Review this policy regularly
 - Update practices to reflect changes in legislation and rail industry expectations
-

13. Continuous Improvement

JSPC Group LTD is committed to continual improvement by:

- Reviewing workforce practices and feedback
 - Supporting client EDI initiatives
 - Learning from incidents, complaints, and audits
-

14. Approval

This Equality, Diversity & Inclusion Policy has been approved by the Directors of JSPC Group LTD and is effective immediately.

Signed:

Director

JSPC Group LTD

Date: J. Sands