



john newton & partners

jnp group

Consulting Engineers

EQUAL OPPORTUNITIES POLICY

Date: January 2019

The Company wholeheartedly supports the principle of equal opportunities in employment and opposes all forms of unlawful direct or indirect discrimination in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership

We believe that it is in the company's best interests, and those of all who work in it, to ensure that the human resources, talents and skills available throughout the community are considered when employment opportunities arise.

To this end, within the framework of the law, we are committed, wherever practicable, to achieving and maintaining a workforce, which broadly reflects the local community in which we operate.

Every possible step will be taken to ensure that individuals are treated equally and fairly and that decisions on recruitment, selection, training, promotion and career management are based solely on objective and job related criteria.

SIGNED BY THE EXECUTIVE WITH OVERALL RESPONSIBILITY FOR EQUAL OPPORTUNITIES:

A handwritten signature in black ink, appearing to read 'Andrew Lee', written over a light blue horizontal line.

Andrew Lee
Managing Director

Date: January 2019



RACE RELATIONS POLICY

Date: January 2019

At JNP Group the promotion of harmonious Race Relations will be an integral part of everyday living and working. We are fully committed to ensuring equality of opportunity, access and treatment both as an employer and as a provider of services.

We believe that any form of racism or racist behaviour, whether deliberate or out of ignorance is unacceptable. Inappropriate language, behaviour or attitudes are not tolerated in any form. All staff are expected to actively discourage racial intolerance and lead by example.

JNP Group is committed to a policy of fair and equal treatment for all staff and visitors. Discrimination on the basis of race, colour, religion, ethnic or national origins, gender, sexuality, physical or mental disability, or for any other reason will not be tolerated.

JNP Group is committed to:

- Actively tackling racial discrimination.
- Actively promoting racial equality and good race relations.
- Making public our stance on promoting equality.
- Encouraging, supporting and helping all employees to reach their potential.
- Working with others to tackle racial discrimination and to encourage and promote good practice in achieving race equality.
- Ensuring our Policy and related procedures are implemented and followed.
- Ensuring all our employees are aware of their responsibilities and are supported appropriately to meet them.

JNP Group requires individuals and organisations delivering services on their behalf to adopt similar standards.

Disciplinary action will be taken against any employees if it is found they have acted in a racially discriminatory way. Breaches of this Policy will be dealt with within the Company's formal disciplinary procedure.

SIGNED BY THE EXECUTIVE WITH OVERALL RESPONSIBILITY FOR RACE RELATIONS:

Andrew Lee
Managing Director

Date: January 2019



DRIVING POLICY

Date: January 2019

JNP Group is concerned about the dangers associated with driving whilst at work. This includes such things as the use of mobile phones, use of alcohol or drugs and excessive driving hours.

In line with current legislation drivers must not use hand held phones or similar hand held devices whilst in control of a vehicle. It is also advised that drivers may risk prosecution if they do not have proper control of their vehicle whilst using a hands free device.

It is our policy that the use of mobile phones is prohibited and the use of hands free models is discouraged and kept to a minimum whilst driving. It is therefore, recommended that all phones are switched off whilst driving. Our employees should also be aware of the possible health risks associated with excessive mobile phone use. The use of mobile phones should be kept to a minimum and landlines used where possible. Mobile phones should not be used for personal use during work hours except in emergency situations.

Under no circumstances are employees to attend work after using alcohol or narcotic drugs, be in possession of alcohol or drugs whilst at work or consume alcohol or drugs whilst working. Employees are also required to report to management any known side effects from prescribed medications. In addition to the above you are required to keep within the recommended legal limit for driving. JNP Group advocates that you do not consume more than 2 - 3 units of alcohol within 24 hours before driving or working, no units within 8 hours before driving or working and no units at any time whilst driving or working.

JNP Group will consider and implement the most suitable system of risk assessment and re-assessment for the road safety needs of the company and its employees. This will include choosing the right vehicle and the safest specification for the needs of the job. JNP Group ensure that work practices, journey schedules, appointments and routes enable our employees to stay within the law.

Our employees should try to ensure that they are well rested, and feeling fit and healthy (and not taking medication which contraindicates using machinery) before starting long journeys. Our employees are required to plan their journey to include regular rest breaks (at least 15 minutes every two hours) or if necessary, plan an overnight stop. They should at all times avoid setting out on a long drive after having worked a full day and avoid driving in a period when they would normally be falling asleep.

Driving in the small hours (between 2am and 6 am) should be avoided except in extreme cases and having gained management approval. Our employees are also aware that when driving between 2pm and 4pm (especially after having eaten a meal) they should be extra careful. Wherever our employees start to feel sleepy during a journey, they must stop somewhere safe and take a short nap.

This forms part of our health, safety and welfare policy and rules for staff. Any breach of this policy will be treated as gross misconduct and dealt with accordingly.

SIGNED BY THE EXECUTIVE WITH OVERALL RESPONSIBILITY FOR HEALTH AND SAFETY:

Andrew Lee
Managing Director

Date: January 2019



MODERN SLAVERY POLICY

Date: January 2019

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. JNP Group have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain. This policy does not form part of any employee's contract of employment and we may amend it at any time. JNP Group is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards. This policy applies to all persons working for JNP Group or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

Responsibility for the Policy

JNP Group Directors have overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all those under our control comply with it. The Directors have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

Compliance with the Policy

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your management as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify management.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with management.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform management immediately.

Communication and Awareness of the Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed. Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. JNP Group will terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

The policy will be monitored and reviewed annually during the JNP Group Management Review Meeting.



Signed:-

Date:- January 2019

Andrew Lee
Managing Director



COMPANY ANTI-BRIBERY CORRUPTION POLICY

Date: January 2019

Bribery and corruption is, unfortunately, a feature of corporate and public life. JNP Group therefore has a clear policy and we support our employees to make decisions in line with our stated position. Our corporate conduct is based on our commitment to acting professionally, fairly and with integrity. JNP Group does not tolerate any form of bribery and corruption.

Purpose

The purpose of this policy is to set out the responsibilities of Company functions and business units in observing and upholding our position on bribery and corruption. In developing this policy we have made reference to the 'Business Principles for Countering Bribery' published by Transparency Ltd.

Scope

This policy applies to JNP Group employees (staff, contract and temporary). Where we have a minority interest we will encourage the application of this policy amongst our business partners including contractors, suppliers and joint venture partners. This policy should be implemented in conjunction with the guidance on giving and accepting gifts and hospitality within the Company.

Policy

Our Company business Principles set out our commitment to operate responsibly wherever we work and to engage the social, environmental and ethical impact of our activities in the markets we operate in.

Our first principle, 'integrity in corporate conduct', states that JNP Group does not engage in bribery or any form of unethical inducement or payment including facilitation payments and kickbacks. All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company. Employees must declare and keep a record of hospitality or gifts accepted or offered, which will be subject to managerial review. We do not make direct or indirect contributions to political parties.

We will uphold the law relevant to countering bribery and corruption in all the jurisdictions in which we operate, particularly laws that are directly relevant to specific business practices. The following national and international laws and conventions underpin this policy:

- OECD Convention on Combating Bribery of Foreign Public Offices in International Business Transactions (1997)
- Foreign Corrupt Practices Act (US)
- OECD Guidelines for Multinational Enterprises – Combating Bribery
- UN Global Compact – Principle 10 (Anti-Corruption)
- Extractive Industry Transparency Initiative

Responsibilities

The Director/Office Head of each business unit will establish appropriate responsibilities and procedures within their operations. If any instance of bribery or corruption is identified, we will take remedial steps immediately.

Training and Communications

We will communicate this policy and relevant guidance to employees across the Company, through our established internal communication channels. We will also communicate this policy to our suppliers and contractors. Line Managers and employees will receive relevant training on how to implement this policy in the scope of their employment of the Company.

Raising Concerns and Seeking Guidance

Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage in total confidence to their immediate line manager/Director/Office Head.

Monitoring and Review

JNP Group will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

Internal Controls and Audit

The Company will establish feedback mechanisms in order to maintain accurate records – available for inspection – which properly and fairly document all financial transactions. Internal control systems will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

SIGNED BY THE EXECUTIVE WITH OVERALL RESPONSIBILITY FOR COMPANY ANTI-BRIBERY CORRUPTION:

A handwritten signature in black ink, appearing to read 'Andrew Lee', with a long horizontal stroke extending to the right.

Andrew Lee
Managing Director

Date: January 2019