

SUPPLIER CODE OF CONDUCT



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Outlining the standards and values that we expect our suppliers to share

INTRODUCTION

GB Railfreight Limited (“GB Railfreight”) strives to achieve mutually beneficial relationships with our suppliers based on common values of ethical behaviour, collaboration and mutual respect. We are committed to operating with integrity and to the highest ethical and professional standards in accordance with the GB Railfreight values set out on the following page

Our Supplier Code of Conduct (“Code Of Conduct”) outlines the standards and values we expect our suppliers to share. Where we refer to “suppliers”, this includes partners, subcontractors, agents, consultants and all suppliers of goods and services.

Our commitment to such high standards helps us hire great people, achieve our business goals and maintain our reputation for excellence.

We appreciate that many of you who we work with will have developed your own principles of work and our Code Of Conduct is not intended to replace those. However, we ask that you understand that to deliver the high standards we have set, we must work only with those who share our values. We expect you to promote these within your own supply chain.

We look forward to working with you.

GB RAILFREIGHT VALUES

PROFESSIONALISM: Safety and security is paramount in our business. Be professional and do what it takes to make others see us as reliable, respectful, and competent. Be conscious of how you treat co-workers and clients and ensure a positive workplace.

SUPPORT: We look after our people and they in turn are encouraged to look after each other. We understand that ‘Life’ happens to all of us and when it does our people can rely on the ‘GBRf family’ ethic for unwavering support, patience and compassion.

COMMUNICATIONS & VISIBILITY: Avoiding tricks, hidden agendas and making information accessible to everyone has a positive impact. Team members can learn from each other’s successes and even failures

TRUST & EMPOWERMENT: We believe that to be truly successful in business and in life, we must always be honest and open with our customers, our stakeholders, suppliers and our employees. We believe that openness and honesty make for the best relationships because it leads to trust and confidence.

ENJOYMENT: Simply – it's a lot easier to do business with a team that are happy, engaged and passionate about what they do.



01 HEALTH AND SAFETY

Our Vision:

The health of our workforce is key in maintaining our place as a leading operator and meeting the Company vision.

We comply with all applicable health and safety laws and follow our safety policies and procedures in order to prevent accidents and promote good health and safety behaviours.

We care for our people and manage the implementation of any reasonable adjustment requirements. We provide support for disabled staff in a sensitive and timely manner. We expect our suppliers to do the same.

Your role:

Take personal responsibility for helping to ensure a safe and healthy work environment.

Work with us to understand and comply with all health and safety laws and to continue to build a safety culture within our industry.

Ensure your worksites are clean and tidy and left in good order.

Ensure your employees and sub-contractors receive adequate training and equipment to carry out their work safely.

Ensure procedures are in place for preventing, managing and reporting safety incidents or unsafe or improper operations.

02 WORKING HOURS, WAGES AND BENEFITS

Our Vision:

We have a zero-tolerance approach to modern slavery and human trafficking in all its forms within our business and our supply chain.

We uphold the rights of everyone working for us or with us and believe that everyone should be rewarded fairly for their skill and contribution and should not be required to work excessive hours.

Your role:

Forced, bonded, compulsory or child labour must not be used. Ensure that working conditions, hours, wages and benefits are in line with all applicable laws.

Do not allow any practice that would restrict free movement of employees.

Recognise and respect employees' right to freedom of association and collective bargaining where permitted by law. Provide a confidential whistleblowing procedure.

03 ANTI-BRIBERY AND CORRUPTION

Our Vision:

We are committed to acting professionally, fairly and with the highest levels of integrity in all our business dealings.

We do not tolerate any form of bribery or corruption and expect the same from our suppliers.

Your role:

We do not tolerate any form of bribery or corruption and expect the same from our suppliers.

Implement and enforce effective systems to counter bribery and corruption.

Never offer, make or authorise a payment (or anything of value) in order to obtain a business advantage and never permit others to do so.

Always inform GB Railfreight of any attempt to bribe you or solicit bribes from you or of any suspicions you might have about bribery and corruption.

04 FAIR EMPLOYMENT PRACTICES, DIVERSITY & INCLUSION

Our vision:

An inclusive work environment in which we all can develop our professional skills and grow as individuals is a fundamental priority for GB Railfreight.

We respect human rights and comply with all applicable employment laws.

We do not tolerate any form of harassment, bullying or discrimination. We base our employment decisions on job qualifications and merit without consideration of nationality, race, age, gender, religion, beliefs, sexual orientation, language, marital status, education or any other characteristics protected by law. We refuse to do business with anyone that fails to respect and protect these basic human rights.

Your role

Treat employees fairly and with respect.

Do not discriminate, bully, harass or make unwelcome sexual advances to employees or other individuals.

Embrace, promote and contribute to an inclusive culture where everyone feels welcome, respected and valued.

Our Vision:

We have a zero-tolerance approach to the facilitation of tax evasion whether under UK law or under the law of any foreign country.

We uphold all laws relevant to countering tax evasion, including the Criminal Finances Act 2017.

We expect our suppliers to undertake their work with a similar zero tolerance approach to to the facilitation of tax evasion.

Your role:

Do not ask or encourage a GB Railfreight employee to engage in a relationship with you which could result in the under payment or non-payment of tax either in the UK or in a foreign country.

Do not engage in or authorise any form of facilitation of tax evasion, nor aid, abet, counsel or procure the commission of a tax evasion offence by another person.

**05 ANTI-FACILITATION
OF TAX EVASION**

06 ENVIRONMENT

Our Vision:

We are committed to protecting the environment. We comply with all applicable environmental legislation and have all relevant approvals, permits and licenses.

We promote the environmental benefits of the mass transit services we provide and actively work to reduce the environmental impact of our operations and services.

We expect our suppliers to work with us to achieve those reductions.

Your Role:

Understand environmental risks and legal requirements relevant to your area of influence.

Use due care, skill and foresight to minimise environmental harm.

Implement and maintain appropriate incident response procedures.

07 CONFIDENTIALITY, PRIVACY AND INTELLECTUAL PROPERTY

Our Vision:

We respect the confidential, private and intellectual property of individuals and businesses.

We only use personal information when needed to operate effectively or comply with the law and ensure that it is not retained longer than necessary to achieve the purpose for which it was obtained.

We ensure that we have appropriate protections and procedures in place to keep personal and confidential information safe and prevent it from being disclosed to persons who do not have a right to that information. We expect our suppliers to meet similar standards.

Your Role:

Protect the personal and confidential information entrusted to you by GB Railfreight from theft or loss. Do not share personal information without permission.

Ensure that all valid intellectual property rights are respected and protected.

Comply with all applicable data protection laws, including the Data Protection Act 2018.

Never share, create or endorse social media content that could be deemed derogatory, offensive or discriminatory, or speak on behalf of GB Railfreight without prior authorisation.

08 CONFLICT OF INTEREST

Our Vision:

We all have a responsibility to make business decisions without regard for personal gain. To be able to do that, we must avoid interests, activities or relationships that conflict with our responsibilities as an employee.

We strive to operate a business within which conflict of interest is actively avoided and expect the same from our suppliers.

Your Role:

Implement appropriate mitigations against any real or perceived conflict of interest.

Disclose to us as soon as you become aware of an actual or potential conflict of interest.

Disclose in advance any relationship with GB Railfreight director, employee, or person working with GB Railfreight that represents or may appear to represent a conflict of interest.

09 GIFTS & HOSPITALITY

Our Vision:

Occasionally, our employees may offer or receive gifts or hospitality as a token of appreciation.

We make sure that our gifts and hospitality are reasonable and do not request or accept gifts and hospitality that may improperly influence or pressure us or others. We expect our suppliers to use their judgement and good sense when making or receiving gifts and hospitality.

We do not tolerate any form of harassment, bullying or

Your Role:

Implement appropriate policies and procedures that outline acceptable circumstances and monetary limits for gifts and hospitality.

Do not request, accept, offer or authorise gifts and hospitality that may create or appear to create a sense of obligation.

If a GB Railfreight employee requests any type of gift or hospitality for free or at a less than fair market value, report it to GB Railfreight.

10 FAIR TRADE

Our Vision:

We believe in free, unrestricted and fair competition that drives efficiency and innovation which benefits our business, our stakeholders and customers.

We do not tolerate any violation of competition laws, antitrust laws or related regulations and we expect our suppliers to work to the same standards.

We want to work with suppliers who only seek competitive advantage through fair and lawful means rather than unfair tactics.

Your Role:

Conduct business in a way that promotes and maintains open and fair competition.

Do not discuss with us commercial information you receive about our competitors or their bids.

Do not participate in price fixing, division or allocation of markets or customers, submission of phantom bids in tender procedures or other mechanisms that limit fair competition in tender situations.

REPORTING A CONCERN

GB Railfreight encourages a culture of openness and transparency and will support suppliers who report in good faith any suspected or known instances of non-compliance. “Good faith” means that, to the best of your knowledge and belief, everything you report is true and that you report everything you know.

You are responsible and accountable for reporting in good faith any suspected or known instances of non-compliance with our Code of Conduct to GB Railfreight’s Compliance Team at compliance@gbrailfreight.com.

SO RELIABLE IT
**MAKES
SENSE**

GB Railfreight

gbrailfreight.com