



**Combined
Policy
Booklet**

March 2026

All policies reviewed and approved by

**Stephen Dole
Managing Director**

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MISSION STATEMENT

“To continue to work with our customers providing a safe, efficient, reliable, flexible, innovative and sustainable service within the Road Haulage Industry”

Stephen Dole
Managing Director
2026

Please note that the following policies are listed in alphabetical order



Alcohol and Drug Driving Policy

1.0 Alcohol and drug policy

- (i) Alcohol and drug misuse or abuse can be a serious problem within the workplace. Employees who drink excessively or take unlawful drugs are more likely to work inefficiently, be absent from work, have work accidents and endanger their colleagues. The Company has a duty to protect the health, safety and welfare of all its employees, customers and clients. In relation to drugs, these rules apply to those that are unlawful under the criminal law and not to prescribed medication. The Company will inform the police if it believes there has been an abuse of controlled drugs by any employee, for which criminal controls are appropriate, either in the workplace or when working on behalf of the Company when they are off the Company premises.
- (ii) Prohibition on alcohol and drug consumption in the workplace

Employees must not work or be on Company premises when under the influence of alcohol or drugs whether taken before work, at work, or during breaks nor must alcohol or drugs be brought onto Company premises at any time other than alcohol at organized and authorized events. Employees must never drink alcohol or take drugs if they are required to drive private or Company vehicles on Company business. Employees must also not drink alcohol or take drugs when they are on operational standby or on call.

Employees representing the Company at business/client functions or conferences or attending Company organised social events outside normal working hours are expected to behave in an appropriate fashion if drinking alcohol and to take specific action to ensure they are well within the legal limits if they are driving. They are prohibited from taking drugs on these occasions.

Social drinking after normal working hours and away from the Company's premises is, of course, generally a personal matter and does not directly concern the Company. The Company's concern only arises when, because of the pattern or amount of drink involved, the employee's attendance, work performance or conduct at work deteriorates.

A breach of these provisions is a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. Depending on the seriousness of the offence, it may amount to gross misconduct and could result in the employee's summary dismissal.

2.0 Alcohol and drug related misconduct

Action will be taken under the Company's disciplinary procedure if misconduct takes place at work as a result of drinking or taking drugs, or if an employee is found to be under the influence of alcohol or drugs whilst at work. Even a small amount of alcohol can affect work performance and, if an employee is found under the influence of alcohol whilst at work, there could be serious health and safety consequences. The same applies to being under the influence of drugs. Incapacity or misconduct caused by an excess of alcohol or drugs at work is a potential gross misconduct offence under the Company's disciplinary procedure and the employee is therefore liable to be summarily dismissed. This also applies to any employee believed to be buying or selling drugs or in possession of or taking drugs on the Company's premises.

The Company reserves the right in any of these circumstances to arrange for the employee to be escorted from the Company's premises immediately and sent home.

If you are prescribed drugs by your doctor which may affect your ability to perform your work you should discuss this with your Manager.

If the Company suspects there has been a breach of the prohibition on substances, or your work performance or conduct has been impaired through substance abuse, the Company reserves the right to require you to undergo a medical examination to determine the cause of the problem. This does not affect the Company's right to regard the matter as an offence of gross misconduct.

If you refuse to undergo a medical examination in such circumstances your refusal will constitute gross misconduct in accordance with the Company's disciplinary procedure.

If, having undergone a medical examination, it is confirmed that you have been positively tested for a controlled drug or you have an alcohol problem, or you admit there is a problem, the Company reserves the right to suspend you from your employment to allow the Company to decide whether to deal with the matter under the terms of the Company's disciplinary procedure or to require you to undergo treatment and rehabilitation.

3.0 Alcohol and drug testing

On the grounds of health and safety and where necessary to achieve a legitimate business aim, the Company reserves the right to carry both random alcohol and drug screening tests on employees in the workplace as well as direct testing of employees where reasonable grounds exist to indicate that the employee is under the influence of drugs or alcohol. If an employee receives a positive test result*, this will be viewed as a potential gross misconduct offence and renders the employee liable to summary dismissal in accordance with the Company's

disciplinary procedure. Refusal to submit to an alcohol or drug-screening test will be considered a gross misconduct.

* positive result means with regards to:

AlcoholThe legal driving limit which is relevant to the country in which you are working.

Controlled DrugsAny indication of presence in system.



Business Ethics Policy Statement

Our aim is to maintain the highest standards of ethics, professionalism and business conduct as well as ensure that we act in strict compliance with the law at all times. We will not tolerate any behaviour or practice that compromises the Company's integrity or honesty. All decisions will be fair and based on transparent processes.

Compliance

Since the Company aims to maintain high ethical standards in carrying out its business activities, practices of any sort that are incompatible with MJD's principles and policies will not be tolerated. Strict adherence to these principles and supporting policies is a condition of employment. The Managing Director has overall responsibility for ensuring compliance with the objectives of this policy.

Independence and Objectivity

MJD is committed to being fair, transparent and impartial in all of its dealings and our members of staff are expected to adhere to specific standards of behaviour, namely:

All staff are required to act in a way that is unbiased, and they must not be subject to any influence which may lead them to act in a way which favours any particular person or organisation. Other than the salary paid by MJD, employees may not directly or indirectly accept any form of payment or material benefit from third parties for services they perform on behalf of MJD. All staff are required to declare in writing any financial or personal interest, direct or indirect, in another company which is either a supplier to or a competitor of MJD.

Unethical Behaviour and 'Whistle-Blowing'

The Company promotes a working environment which encourages all members of our team to express their concerns about behaviour or decisions that they perceive to be unethical without fear of reprisal or victimisation. Any member of staff who needs guidance or advice on business ethics issues should speak to his or her manager or the Managing Director. The Managing Director is responsible for initiating and supervising the investigation of all reports of breaches of these principles and policies and ensuring that appropriate disciplinary action is taken when required.

Employment Policies

MJD is committed to attaining the highest standards of employment practice and wishes to be recognised as a good employer. It is committed to communicating its strategy and objectives to employees and to keeping employees informed on the Company's progress against the strategy and objectives. We support and promote the ethos and principles of equal opportunities in employment, striving to create a culture where every member of our team is treated fairly and without fear of harassment or victimization for any reason. We seek to develop all MJD staff members, providing support and encouragement to further their personal development wherever possible within the business.

Balancing Transparency with Confidentiality

MJD will be transparent in all of its operations except where it is constrained by issues of confidentiality. The Company will strive to communicate clearly in order to minimise complexity in our business dealings. We will comply with the provisions of the Data Protection Act and members of staff will be trained accordingly.

Protecting Business Assets

All members of staff are required to avoid waste and are encouraged to identify improvements to systems and procedures to achieve maximum effectiveness, efficiency and responsiveness.

All employees are expected to follow agreed procurement procedures when commissioning third party services. Company's assets and funds may only be used for the legitimate business purposes of MJD.

Suppliers, Advisors and Agents

MJD will aim to develop relationships with its suppliers and advisors based on mutual trust and shared values.

Therefore:

- * All members of staff will conduct business with suppliers and advisors in a professional manner.

- * As far as is practicable, we will engage with our business partners on matters relating to Corporate Responsibility.

Competitors

MJD will:

- * Compete in a lawful manner.
- * Not seek to damage the reputation of competitors, either directly or by implication or innuendo.
- * Avoid discussing proprietary or confidential information in any contacts with competitors.
- * Not attempt to acquire information regarding a competitor's business by unlawful means, including industrial espionage, hiring competitors' employees to obtain confidential information, urging competitors' employees, clients or occupiers to disclose confidential information, or any other approach that is not above board.

Governance and Financial Matters

MJD will:

- * Comply with all laws, rules and government regulations that are applicable to the Company.
- * Maintain accurate business records, following best practice in all respects.
- * Maintain financial statements and accounts in a manner that are accurate and auditable.

Contractual Arrangements

MJD is committed to meeting its contractual commitments and will build relationships with its suppliers, agents and contracted service providers based on mutual trust. All members of staff are expected to understand and comply with the terms of the contracts for which they have a responsibility.



Corporate Social Responsibility (CSR) Policy

MJD aim to deliver a world class service within the logistics and storage industries, whilst maintaining the highest health, safety, environmental and ethical standards. MJD are committed to ensuring that the company does not carry out any operation which has a negative effect on those with whom we directly interface and, in particular, the environment in general. Where possible we adhere to the standards set out under the AA1000 set of principals.

We have broken down our CSR into five areas and have formulated individual Policies and Procedures for managing these responsibilities. MJD see that all five areas are of equal importance and are detailed below purely in an alphabetical order.

- 1) Business Ethics & Conduct
- 2) Customers, Suppliers and the Community
- 3) Employer Responsibilities
- 4) Environmental
- 5) Health & Safety

Business Ethics & Conduct

MJD is committed to ensuring that the business is operated using the highest possible standards of ethics and that it conducts all activities with decency and integrity. MJD are also committed to only partnering (Customers and Suppliers) with companies who are able to demonstrate a similar level of commitment to these standards.

Customers, Suppliers and the Community

In order to provide a world class service within the logistics and storage industry it is essential that we partner with companies which have an equal commitment to CRS as our own. We are committed to dealing with our Customers in an open and transparent way, using procedures which enhance our service and which support both companies commitment to CRS. Suppliers to MJD are chosen not purely on a cost basis but, as importantly, their commitment and demonstrated ability to adhere to all aspects of their service which impart either directly, or indirectly, on MJD's CRS. MJD are conscious of our wider social responsibility and the way in which our operation impacts on our customers, local communities and on society in general. MJD are particularly mindful of the impact LGV's can have on the local environment and have implemented driver procedures which are designed to minimise our impact on the local communities. MJD seek to actively engage with the local community, bringing enhancements and improvements where possible.

Employer Responsibilities

MJD takes its responsibility as an employer seriously and values the contribution that our staff makes to the operation as a whole. For our part we are committed to comply with, and exceed where possible, current national and international legislation. We are committed to treating everyone with dignity and respect and will not discriminate on the grounds of nationality, religion, political or philosophical beliefs, age, gender, sexual orientation or any other factor. We have adopted fair and inclusive practices within the business and will not tolerate prejudice, discrimination, bullying and harassment. We are committed to providing individual development plans for all staff, providing mentoring, coaching and training where appropriate.

Environmental

MJD are mindful that business's have a major role to play in ensuring the future of our planet as we know it and are committed to ensuring that our operation is carried out in a sustainable way, with as minimal an impact on the environment as possible. MJD are acutely aware that the logistics industry is a major contributor to CO2 emissions, through the use of diesel as a road fuel. MJD are committed to ensuring that these are kept to a minimum, through the use of environmentally efficient vehicles, efficient logistics planning and ongoing driver training. Whilst it is recognised that vehicle fuel usage forms the bulk of the company's CO2 emissions, MJD have implemented a carbon reduction programme that encompasses all aspects of the business operation. MJD are committed to regular monitoring the carbon footprint of the company and

have set a target of reducing both carbon and other emissions by 20% over the five years from 2026.

Health & Safety

MJD are committed to planning and executing all aspects of its operation in a manner that ensures the health, welfare, and safety of all employees, customers, suppliers and the general public. Our safety policy is based on a process of continual improvement and ensures that the company adheres to all relevant legislation. Our safety policy is based on the principle that there is never a reason for working in an unsafe manner, that all accidents and injuries are preventable and that safety is the responsibility of all employees.



Diversity Policy and Statement

MJD is firmly committed to diversity in all areas of its work.

We have much to learn and profit from diverse cultures and perspectives, and we believe that diversity will make our organisation more effective in meeting the needs of all our clients and candidates.

MJD aims to develop, promote and deliver its services, information and employment opportunities without discriminating on the basis of a person's age, race, religion or belief, creed, colour, ethnic origin, nationality, marital or parental status, sex, sexual orientation, or on the grounds of disability.

MJD has a commitment to be an organisation that:

- Develops services to achieve equality and diversity in all its activities;
- Endeavours to have a workforce generally reflecting the population;
- Understands how valuing diversity can improve our ability to deliver better services;
- Actively consults with different individuals and communities to ensure that services which are provided are responsive and reflect the diversity of need;
- Provides all employees with the training and development they need to enable them to achieve organisational goals;
- Provides a supportive, open environment where all employees have the opportunity to reach their full potential;
- Listens to its customers and involves them in the development of services that recognise and value diversity; and
- Believes that both customers and employees have important parts to play in making this happen.

Diversity Strategies

Overall our Diversity Strategy is to ensure that our Diversity Policy is applied fairly and consistently across the Organisation, as an integral part of the service we provide.

We recognise peoples' differences and aim to ensure that each individual is treated with respect.

To achieve the aims of our overall strategy we will take action to address discrimination, as well as action to promote diversity in employment and service.

The strategies reflect the existing and forthcoming EC and UK legislation and definitions for Equality.

All the specific strategies, actions and outcomes are company-wide and apply to all offices. They should be applied and managed as part of their more detailed Action plans.

Employment

MJD has a diverse workforce which has the skills and understanding to achieve a quality service responsive to individual and customer needs.

As an organisation, we are committed to ensuring that all people are treated fairly and without unlawful discrimination. As an employer, we aim to ensure that all employees treat each other with dignity and respect.

We aim to develop a working environment where harassment is unacceptable and where individuals feel confident enough to bring complaints without fearing prejudice. In the unlikely event that harassment occurs, we have strong policies and procedures in place to deal with it.

To achieve our aims we will:

- Provide full and fair consideration to all job applications.
- Require all our employees to undergo relevant training as part of their induction.
- Provide sufficient training and support to meet all our employees' needs in recognising and carrying out their work responsibilities.
- Regularly review our recruitment, selection, training and promotion procedures, ensuring they remain fair and reflect current best practice.
- Maintain records in recruitment, training and employment and use this information to assist in identifying areas of inequality.
- Help all employees to realise their full potential by ensuring they receive fair consideration of their training and career development needs as well as promotion opportunities
- Whenever possible modify employment practices and procedures to reduce barriers member of disadvantaged social organisations may experience in seeking, and during, employment.
- Develop processes to deal with harassment, bullying and dignity at work which can operate within a safe and open environment.
- Follow Government guidance on applying the relevant UK legislation.

Race

MJD is committed to achieving racial equality. We recognise our duties under the Race Relations Acts and related Codes of Practice, as embodied in the Equality Act 2010, and undertake to strive for racial equality both in employment and service provision.

To achieve our aims we will:

- Provide services relevant to people's needs, respecting their cultural and social identities.
- Strive to have a representative workforce that can sensitively address the needs of all communities.
- Work with other organisations to promote racial equality and eliminate racial disadvantage and racial harassment.
- Only accept an environment which is free from racial harassment and racist behaviour.
- Encourage people from minority communities to take up employment and training opportunities in areas and levels where they are underrepresented.
- Follow Government guidance on applying the relevant UK legislation.

Religion

Our strategy is to counter unlawful discrimination and harassment on grounds of religion and belief and to promote good relations between people of different religions and beliefs.

To achieve our aims we will:

- Strive to create an environment which recognises and respects religion and belief.
- Improve the understanding of religion and belief among our staff so that they can sensitively address the needs of individuals and of different faith communities.
- Along with other organisations promote understanding and good relations between people of different faith communities.
- While separate from our Race Strategy, our actions for religion and belief will be broadly similar in principle.
- Follow Government guidance on applying the relevant UK legislation.

Carers

We wish to create an environment where employees, both women and men, are free to share their needs and concerns as carers and are not disadvantaged in the workplace by doing so.

We acknowledge that caring responsibility may include caring for children, a person with a disability and older people.

To achieve our aims we will:

- Work with both men and women to identify the needs of all carers and develop appropriate arrangements to meet those needs.
- Within the constraints of effective service delivery, where possible MJD will make the best possible use of flexible working practices to support carers in our workforce.
- Promote awareness of what flexible working practices are available to support carers.
- Develop an organisational culture, which provides a supportive environment for carers.
- Follow Government guidance on applying the relevant UK legislation.

Gender

MJD is supportive of achieving gender equality under the Sex Discrimination and Equal Pay legislation and codes of practice, as embodied in the Equality Act 2010, and undertake to strive for gender equality in service provision and employment.

To achieve our aims we will:

- Create an environment which is free from harassment and sexist language and behaviour.
- Encourage men and women to take up employment and training opportunities in areas where they are under-represented.
- Set targets to achieve a better gender mix throughout the organisation.
- Work alongside other organisations to promote gender equality.
- Provide flexibility within the working environment which recognise and supports work and home balance requirements (also see Carers strategy).
- Follow Government guidance on applying the relevant UK legislation.

Sexuality

MJD is aware of the real discrimination that people face due to their sexuality and life choices and we are committed to removing this unfair treatment from our working environment.

We want to create an open environment where Lesbians, Gay men, Bisexual and Transgender people feel safe to be open about their sexuality and difference, if they choose to do so.

The organisation will work to make its service accessible to everyone, and ensure that our employment policies and service delivery are not based on the assumption that everyone is heterosexual.

To achieve our aims we will:

- Develop policies and procedures to prohibit unfair treatment of Lesbians, Gay men, Bisexual and Transgender staff.
- Provide the same level of service irrespective of any employee's or customer's sexuality.
- Where appropriate, develop services to meet the needs of Lesbians, Gay men, Bisexual and Transgender people
- Follow Government guidance on applying the relevant UK legislation.

Disability

MJD recognises that people with a disability are disadvantaged both by an environment and by social attitudes, reflecting the needs of non-disabled people. We are committed to achieving disability equality by, wherever reasonably possible, eliminating both unlawful discrimination on the grounds of disability and the disadvantage experienced by people with a disability. We also recognise that improvements in the operation of our services can reduce the disabilities faced by the disabled.

To achieve our aims we will:

- Recognise our responsibilities under the Disability Discrimination Act 1995, EU Directives and other legislation and will follow the relevant DRC Codes of Practice for employment, premises and services, as embodied in the Equality Act 2010.
- Strive to provide services, which are relevant to the needs of people with disability.
- Try to ensure that all our services and documentation are accessible and available to people with a disability.
- Whenever possible modify our procedures to make full use of an individual's ability and adapt our facilities as necessary to accommodate people with a disability.
- To ensure DDA requirements are met, we shall perform regular "audits" of our premises, services and processes.
- Where needed, provide managers and staff with training in awareness and confidence to support people with a disability.
- Whenever practicable, continue to employ staff who become disabled during their employment, and assist in their re-training.
- Guarantee people with a disability an interview for any employment vacancy for which they meet the minimum essential criteria.
- Provide systems which seek to maximise access to employment by people with a disability.

- Follow Government guidance on applying the relevant UK legislation.

Age

MJD recognise that age discrimination can affect all age groups and both genders, age is no indicator of effectiveness in most work activities and employment decisions should not be based on age . We will value people regardless of age and aim to provide services that should be sensitive to the needs of all age groups. We will work to create an environment where people are judged on their talents, skills and experience, rather than on misconceptions and prejudices about age.

As an organisation we are committed to opposing unjustified age discrimination and recognise the need for our own strategy to be in line with the Employment Equality (Age) Regulations, as embodied in the Equality Act 2010.

To achieve our aims we will:

- Remove age-related criteria in our employment practices.
- Regardless of age, provide recruitment, training and promotion on the basis of need.
- Work with organisations to eliminate age discrimination.
- Work to ensure that older workers are able to remain with or leave the organisation with dignity and flexible working arrangements.
- Follow Government guidance on applying the relevant UK legislation.

Cohesion

MJD recognises that it may also need to deal with discrimination against groups not elsewhere covered, in line with existing or forthcoming UK legislation. For example, the review of legislation on employment of ex-offenders, a group which is estimated by the Home Office to cover over a quarter of the working-age population. MJD has for many years worked with the Prison Service to provide but full and day release employment for offenders.

To achieve our aims we will:

- Continue to review and progress the organisation's Diversity Policy and Strategies so that they reflect the true diversity of society.

Responsibilities

All staff

All staff will be given full training and support to ensure this policy is put into practice. However, we expect a personal commitment from all employees in making it effective and in setting an exemplary standard for others to follow.

All members of staff will take responsibility to:

- Ensure they understand the values and benefits of equality and diversity;
- Become familiar with this policy, to follow it, and ensure that any staff for whom they are responsible do so as well;
- Draw to the attention of their line manager any instances of apparent discrimination or any perceived problem in relation to employment or to the provision of services.

Directors and Senior Management

The Directors have corporate responsibility for ensuring that this policy underpins all aspects of our work. The Directors are responsible for developing the organisational culture in which this policy can operate effectively and for ensuring that it is implemented.

Directors and Senior Management are individually and corporately responsible for ensuring that the policy is implemented in their particular areas of responsibility.



ENVIRONMENTAL & SUSTAINABILITY POLICY

Our objective is to create a climate of excellence not only in our services, but also for our employees, persons affected by our activities and the environment. Our Environmental Policy commits the organisation at all levels to ensure that we:-

1. Identify any risk of pollution arising from any of our activities, which shall then be either eliminated or effectively controlled to meet or exceed all regulatory requirements relating to the environment.
2. Reduce to a minimum unnecessary use of materials, resources and energy. Reduce to a minimum the environmental effect on all future developments and carry out an appraisal of the environmental effect of sourcing of raw material.
3. Reduce waste to the lowest practicable level ensuring responsible disposal of waste created and received, undertaking environmental audits.
4. Advocate employee involvement in all environmental matters. This shall be further advanced through the provision of regular in-house Driver CPC training.
5. Minimise any adverse environmental effects caused as a result of our activities adopting the principle of best available techniques not entailing excessive costs. To be mindful, and have due respect for the impact of our activities on residents within the locality of our depot, in addition to the effect our operation may have on the environment as a whole.
6. Ensure that any persons, such as agency drivers or sub-contractors, working on our behalf are made aware of and agree to comply with this policy.
7. Seek to ensure that products and/or services supplied or provided by third parties can be used, handled, stored and disposed of in a manner which safeguards the environment and the health and safety of all.

8. a) Ensure vehicle engines are switched off when stationary.

b) Prevent fuel wastage and other dangerous environmental effects.

c) Dispose of all vehicle rubbish/used parts/tyres in an authorised manner.

9. Implement logistics planning and operational procedures by the Traffic Office which will ensure that wherever possible, the routing of vehicles will ensure that vehicle routes are planned in the most efficient manner, with specific reference being to eliminate unnecessary mileage and avoid traffic delays, thereby ensuring that CO2 emissions are kept to a minimum level.

10. Seek, trial and implement technological changes to our operation which will provide environmental and sustainability improvements.

11. Publish on the company website a CO2 report.

12. MJD have committed to becoming carbon neutral in line with the UK Governments current timetable. We have also set carbon reduction targets within the SBTi framework (Science Based Targets), committing us to a minimum carbon reduction of 25% over the next five years.
<https://sciencebasedtargets.org/>

13. We are also achieved bronze accreditation from Ecovadis with respect to sustainability achievement. We are committed to improving our accreditation to at least Silver standing during 2026.

14. Undertake a review of this policy in the light of any new knowledge, changing legislation or public concern.



Equal Opportunities Policy

Equal Opportunities In Employment Statement

MJD is committed to preventing discrimination in its employment practices by stimulating genuine equality of opportunity.

MJD aims to develop, promote and deliver its services, information and employment opportunities without discriminating on the basis of any aspect of an individual's background or heritage which is used as justification for unfair treatment.

MJD opposes all discrimination on the ground of age, race, religion or creed, colour, ethnicity, nationality, marital or parental status, sex, sexual orientation, or on the grounds of disability or any other protected status. We are keen to promote good relations in the Community by providing a non-discriminatory service.

We are actively deter discrimination on the grounds of sex and counter discrimination against men and women in all employment practices, recognising the demands of childcare and the care of the other dependants.

MJD ensure that lesbians and gay men will be given the same priority of all jobs as applications from other groups who are represented in the company.

Disabled application will not be barred from selection on the grounds of disability unless arrangements for working with or around the disability cannot reasonably be made.

We value people for their competencies, and age is not a consideration when selecting our candidates.

Equal Opportunities Policy

MJD is firmly committed to diversity in all areas of its work and we recognise that we have much to learn and profit from diverse cultures and perspectives; we believe that diversity will make our organisation more effective in meeting the needs of all our clients and candidates.

MJD actively promotes equal opportunities. This applies in the recruitment, selection, training and promotion of all grades of staff employed by the Company and amongst those who use our services – both candidates and employer clients. Promoting equality of opportunity means that everyone is treated solely on the basis of competence and merit, regardless of age, gender, marital status, ethnic, racial or religious or disability considerations, or any other protected status.

All employees are made fully aware that discriminatory acts are treated as gross misconduct. We draw all employees' attention to the Codes of Practice on gender, race and disability on the Equality and Human Rights Commission (www.equalityhumanrights.com), which have specific guidance for employment agencies. The relevant sections of the Codes are reproduced as part of this policy and all staff are expected to comply with them.

1. Recruitment, Training and Development

- 1.1. All recruitment and selection, whether internal or external, will be conducted on a non-discriminatory basis and monitored by the Directors.
- 1.2. All training and development services will be planned and executed on a non-discriminatory basis and made available to as many employees as possible.
- 1.3. All promotions will be on a non-discriminatory basis.
- 1.4. No vacancies circulated to employees will contain any directly or indirectly discriminatory statements.
- 1.5. Training in recruitment, selection and appraisal will be provided as widely as possible.
- 1.6. All recruitment materials including application forms will be designed to eliminate discrimination and promote equality of opportunity.
- 1.7. Appraisals are intended to form the basis of employee development
- 1.8. Any ability or psychometric testing used in recruitment and selection will be free of bias
- 1.9. Monitoring of recruitment, selection and promotion will be undertaken to assess the success of the policy.

2. Terms and Conditions of Employment

- 2.1. Whilst these may be different for different employees, they will be designed to reflect the policy and to promote it.
- 2.2. All terms and conditions will be continuously reviewed to ensure their alignment with the policy.

- 2.3. Wherever possible, working patterns will be “family friendly”.
- 2.4. The implementation of employment policies that are attractive to people returning to work will be given high priority.

3. Operating MJD’s Service to Candidates

- 3.1. All dealings with job candidates will be conducted in accordance with the Equal Opportunities Policy, as well as the law, and monitored by the manager.
- 3.2. All job vacancies and temporary assignments from employer clients will be accepted and handled on a non-discriminatory basis only.
- 3.3. Appropriate measures will be taken to bring the Policy to the attention of employers, clients and candidates in written communication with them.
- 3.4. All advertising, marketing and promotional material will reflect the Policy.
- 3.5. All pre-selection methods will reflect the Policy.
- 3.6. MJD employees must not make remarks, either verbal or written, which could result in direct or indirect discrimination.

4. Breach of the Policy

- 4.1. Any apparent breach of the Policy by an employee will be dealt with through the Disciplinary Procedure.

Proven discrimination will be treated as gross misconduct



Flexible Working Policy

This policy follows the statutory (legal) minimum procedure for flexible working requests. Employers must make a final decision on statutory requests, including any appeal, within a maximum of 2 months. This policy includes some suggested timings that follow this limit. If you set your own timings, check they follow the statutory time limit.

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Introduction

MJD encourages staff to consider flexible working arrangements. The organisation recognises that a better work-life balance can improve employee motivation, performance and productivity, and reduce stress. Therefore, the organisation wants to support its employees to achieve a better balance between work and their other priorities, such as caring responsibilities, leisure activities, further learning and other interests.

The organisation is committed to agreeing any flexible working arrangements, provided that the needs and objectives of both the organisation and the employee can be met.

It is the organisation's policy to encourage open discussion with employees. If an employee thinks they may benefit from flexible working, they can either:

- contact their line manager to arrange an informal discussion to talk about the options
- submit a flexible working request, by following the steps in this policy

This policy does not form part of the employment contract, and can be amended at any time.

What flexible working is

Flexible working is any type of working arrangement that gives some degree of flexibility on how long, where and when an employee works.

For example:

- compressed hours
- flexitime
- hybrid working
- job sharing
- part-time working
- remote working
- staggered hours
- term-time working
- working from home

These examples are considered to be the typical arrangements that employees will request. However, the organisation recognises that there may be alternatives or a combination of options which are suitable to both the organisation and the employee.

Types of flexible working

Please note that all requests for flexible working must be in line with the UK regulations in force at the time of the request, in particular with respect to the working time rules for Drivers Hours.

Compressed hours

Compressed hours means an employee works their usual full-time hours in fewer days by working longer blocks. There is no reduction in the employee's pay. For example, a 5-day week is compressed into 4 days, or a 10-day fortnight into 9 days.

Flexitime

Flexitime allows an employee to choose when to begin and end work, within certain limits.

An employee is required to work during core hours and must work an agreed number of hours during the accounting period. Their hours of attendance will be recorded and added up at the end of each accounting period.

An employee can carry over an excess of hours or a deficit of hours from one accounting period to another. A deficit of hours should be made up in the following accounting period. An employee can use excess hours to either reduce attendance outside of core hours or take additional leave (flexi leave). Flexi leave is subject to a maximum of full days in any accounting period. An employee should request and agree flexi leave with their line manager, in the same way as holiday entitlement (annual leave).

Hybrid working

Hybrid working is a mixture of working remotely and in the employer's premises. Working remotely can include working from home or other agreed locations.

Part-time working

Part-time working covers any arrangement where an employee is contracted to work anything less than typical full time hours for the type of work in question. For example, an employee who works Monday to Wednesday.

All posts are available on a part-time basis, except where this is not practical.

Remote working

Remote working means working from anywhere other than the employer's premises. This can include working from home or any other agreed location. The organisation can consider remote working as being an occasional agreed day, a mix of working remotely and in the workplace, or a full-time arrangement.

Staggered hours

Staggered hours means having a different start and finish time to other employees. For example, working from 7am to 4pm instead of 9am to 6pm.

Term-time working

Term-time working is where an employee's contractual working hours are during school terms only.

An employee does not work during school holidays. Any weeks above their annual leave entitlement are unpaid. Salary can be paid in 12 equal monthly instalments. Alternatively, an employee can ask to be paid for the time worked only and receive no pay during the holidays apart from their holiday entitlement (annual leave).

Working from home

Working from home or homeworking is when an employee regularly carries out all, or part of, their duties from home rather than the employer's premises. The organisation can consider homeworking being an occasional agreed day, a mix of working at home and in the workplace, or a full time arrangement.

Our approach to flexible working

The organisation is committed to providing a range of appropriate working patterns. There are many different types of flexible working. While some might not be practical for every job, it's likely other types will work. The organisation commits to look at what's possible.

Where a flexible working arrangement is requested, the organisation will take into account a number of criteria. This includes:

- the costs associated with the proposed arrangement
- the effect of the proposed arrangement on other staff
- the need for, and effect on, supervision
- the existing structure of the department
- the availability of staff resources
- details of the tasks specific to the role
- the workload of the role
- whether it is a request for a reasonable adjustment related to a disability
- health and safety issues

The organisation is committed to agreeing any flexible working arrangements, provided that the needs and objectives of both the organisation and the employee can be met.

Eligibility

All employees have a statutory right to request flexible working from the first day of employment.

The organisation is also open to discussing flexible working arrangements with employees before their first day.

Submitting a flexible working request

An employee is entitled to submit 2 statutory flexible working requests in a 12-month period.

An employee can only have one live request at a time. A request will stay live until any of the following happen:

- the organisation makes a decision
- the employee withdraws the request
- the employee and organisation agree an outcome
- it's been 2 months since the date of the request

All requests must be made in writing.

Any request must include:

- the date of the request
- the changes that the employee is seeking
- the date the employee would like the proposed change to start
- whether this is a statutory or non-statutory request
- whether the employee has made any previous flexible working requests to the organisation
- the dates of any previous requests

If the request relates to a reasonable adjustment for a disability under the Equality Act 2010, the employee should make this clear in the request.

If a request does not contain all of the required information, their line manager will advise the employee what else they need to provide and ask the employee to resubmit the request.

Responding to a flexible working request

MJD will consider the proposed flexible working arrangements. They will look at the potential benefits and adverse effects to the employee and to the organisation in implementing the proposed changes.

Each request will be considered on a case-by-case basis, in the order they are received. Agreeing to one request will not set a precedent or create the right for another employee to be granted a similar change to their working pattern.

Where an employee's request needs further discussion, the organisation will invite the employee to a consultation meeting. If a meeting is arranged it will be held within 10 working days of the organisation receiving the request. This time limit may be extended with the agreement of both the employee and the line manager.

Where an employee's request can be approved in full without a consultation meeting, the organisation will confirm this in writing within 10 working days of receiving the request. This will include details of the new arrangements and an invitation to talk about the new arrangements. This time limit may be extended with the agreement of both the employee and line manager.

The organisation will make a decision on all requests, including any appeal within a maximum of 2 months. This time limit may be extended with the agreement of both the employee and **[HR department / line manager / name of individual]**.

Consultation meetings about flexible working

If the employee is invited to a consultation meeting their line manager will discuss:

- the request
- how the proposed working arrangements might work
- how it could be of benefit to both the employee and organisation

The employee will be given advance notice of the time, date and place of the meeting. If the initial date is problematic then one further date will be proposed. This meeting will be in person or a video call, or a telephone call if neither of those are possible.

At the meeting the employee may, if they wish, be accompanied by a colleague or a trade union representative.

If the employee fails to attend a meeting and then fails to attend a rearranged meeting without good reason, their request will be deemed to have been withdrawn.

Communicating a decision after consultation

After a consultation meeting, the request may be granted in full, in part or refused.

The organisation may:

- propose an alternative option
- grant the request on a temporary basis
- ask the employee to try the flexible working arrangement for a trial period

If a working arrangement is agreed, the employee will be sent a confirmation letter within 10 working days of the consultation meeting. This will include details of the new arrangements and an invitation to talk about the new arrangements.

If the organisation refuses the request, the employee will be given the decision in writing within 10 working days of the consultation meeting.

Right to appeal a decision

An employee has the right to appeal the decision if their request is refused or is only agreed in part.

The employee may submit an appeal within 5 working days **[5 working days]** of being notified of a decision on their request. This should be done in writing and clearly state the reasons for their appeal.

The appeal will be heard within 5 working days. The employee will then be informed of the outcome of their appeal within 5 working days of an appeal meeting. These time limits may be extended with the agreement of both the employee and the line manager.

At the appeal meeting the employee may, if they wish, be accompanied by a workplace colleague or a trade union representative.

Requesting a reasonable adjustment

The organisation is committed to reducing and removing disadvantages for disabled employees.

If an employee needs to change where, how or when they work because of their disability, they can request a reasonable adjustment under the Equality Act 2010. If an employee requests a reasonable adjustment, they do not need to also make a flexible working request.

To request a reasonable adjustment, send your request by email or letter to line manager and include:

- that you're making a request for a reasonable adjustment under the Equality Act 2010
- the adjustment you're requesting

Your line manager will discuss your request with you within 5 days of the organisation receiving the request. The outcome will be confirmed in writing within 5 days of the discussion, including any agreed reasonable adjustments. These time limits may be extended with the agreement of both the employee and your line manager

Trialling new working arrangements

Where there is some uncertainty about whether the flexible working arrangement is practical for an employee or the organisation, a trial period may be agreed.

A trial period will allow enough time to implement and get used to the new arrangement before making any decisions on its viability.

The organisation will put any trial arrangements in writing to the employee. This will include their new working pattern and make clear that it is only a temporary change to the employee's terms and conditions.

The employee will be informed in writing of the start and end dates of the trial period. The organisation may reduce or lengthen the trial period where necessary, with the agreement of the employee.

The organisation will reserve the right, at the end of the agreed trial period, to require the employee to revert to their previous working arrangement. In this situation, the organisation will give the employee two weeks' notice.

Varying an employee's contract

Where flexible working practices are agreed as a permanent change, any variation to the employee's terms and conditions will be put in writing. Written confirmation of the changes will be sent to the employee within one month of the change being agreed.

Complaints and further information

An employee should raise any concerns with line manager if they:

- are not satisfied with any stage of the flexible working request process
- feel they have been treated unfairly because they've made a flexible working request

If informal discussions do not resolve the matter to an employee's satisfaction, they should raise a grievance under the organisation's grievance procedure.



Health & Safety Procedures

MJD operate a three tier Health & Safety Policy.

Level 1 CSR Policy Statement

A Health & Safety Policy Statement is contained within the Company CSR Statement– this gives an overall commitment to achieving excellence in all aspects of Health & safety.

Document : MJD CSR POLICY

Level 2 A) Health & Safety Policy

This identifies the how the Company approaches Health & Safety and highlights the specific areas which the business addresses on a regular basis

Document : MJD Health & Safety Policy

B) Company Handbook

Aimed specifically at the Company's employees.

Document : MJD COMPANY HANDBOOK

Level 3 Specific requirements

This covers areas such as Customer and Site specific Health & Safety requirements or issues. It also covers the Risk Assessments carried out for both the general operation of the Company and the where specific issues are identified.

Documents : Risk Assessments

Site Specific Information - Site Maps and Site Rules



Health and Safety Policy Statement

MJD aims to ensure that the health, safety and welfare of our employees while they are at work and of others who may be affected by our undertakings. This general policy statement provides a commitment and intent to comply with the Health and Safety at Work etc. Act 1974.

To ensure the principles of health and safety are clearly understood throughout the Company, we will be committed to:

1. complying with relevant health and safety laws and regulations, voluntary programmes, collective agreements on health and safety and other requirements to which the Company subscribes;
2. setting and monitoring of health and safety objectives for the Company;
3. effective communication of and consultation on health and safety matters throughout the Company;
4. assessing the risks to the safety and health of our employees and others who may be affected by our activities and implementing controls to minimise those risks;
5. ensuring that staff are provided with stress and mental health support throughout their time with the company.
6. preventing work-related injuries, ill health, disease and incidents;
7. providing and maintaining safe plant and equipment and implementing safe systems of work;
8. the safe use, handling, storage and transport of articles and substances;
9. providing and maintaining a safe working environment with safe access, egress and welfare facilities;
10. providing the necessary training to our employees and others, including temporary employees to ensure their competence with respect to health and safety;
11. providing suitable and sufficient information, instruction and supervision for employees;
12. continually improving the performance of our health and safety management;
13. devoting the necessary resources in the form of finance, equipment, personnel and time to ensure the health and safety of our employees and seeking expert help where the necessary skills are not available within the Company;
14. an annual review and when necessary the revision of this health and safety policy;
15. making this policy available to relevant interested external parties, as appropriate.



Health and Safety Arrangements for all Employees

Safety rules, risks and procedures

The Company's general safety rules, risks and procedures relevant to its office environment are listed below. You should make yourself aware of your responsibilities to protect yourself, and ensure you comply with the following rules. Failure to comply will be addressed through the Probationary or Disciplinary Procedure.

Display screen equipment ('DSE')

If you work with a VDU and develop pain, stiffness or numbness which you think is due to your work, tell your Manager without delay.

Electricity and electrical equipment

The Company maintains its electrical systems to prevent danger so far as is reasonably practicable.

Never use electrical equipment if you have reason to suspect it is unsafe.

You should not use equipment if you can see signs of damage, wear or overheating

Get your Manager's permission before you dismantle, repair or modify electrical equipment or fit a mains plug.

Fire

- Learn the fire evacuation procedure
- Respond promptly to fire alarms
- Respect fire safety measures such as clear corridors, closed fire doors and unobstructed exits.
- If you notice smoke or any other sign of a fire, raise the alarm immediately. Only fight the fire if you know how to do it and are sure you will be safe - otherwise evacuate and close doors as you leave.

Good housekeeping

a) Hygiene

- No food or drink to be consumed outside kitchen/dining area (except water, or drinks held in covered mugs).
- All rubbish to be put in wastepaper bins – excess to be placed in black bags and placed in designated area.
- The kitchen is to be kept clean and tidy by employees.

b) Tidiness for Safety

- Do not let cables trail to create trip or electrical hazards. If necessary use ties or cable ramps
- Be careful about putting things on the floor.
- Never leave things on the stairs.
- Clear desk policy at the end of the day.

First aid

Familiarise yourself with the arrangements for providing first aid or otherwise dealing with injury.

Accidents and injuries

If you have an accident at work you must immediately tell your Manager, who will complete the accident book for any accident at work involving a person:

- Who is on the Company's premises; and/or
- Who is a Company employee.

If an accident at work results in an incapacity for work for more than seven days (including Saturdays, Sundays and Bank Holidays) your Manager will also complete form F2508 – available at www.hse.gov.uk.

In the case of death, a specified major injury or condition, or a dangerous occurrence:

- The Health and Safety Executive (HSE) must be notified immediately (e.g. by telephone)
- A written report must be submitted within seven days, normally by using form F2508.

Copies of all completed F2508 forms are kept by the Chief Executive.

Accident investigation

If there is an accident at work, to investigate we may:

- Interview injured workers and witnesses
- Examine the workplace for factors associated with the accident
- Determine the cause of the accident
- Take corrective action to prevent the accident from recurring
- Recording the findings and actions taken

Hazardous substances

If hazardous chemicals are received on the premises, the Company's receipt of hazard data sheets will be recorded. In these circumstances we will conduct assessments for the processes in which the hazardous substances are used, including who will use them and when they are to be used.

Lone working

You should avoid working alone after regular office hours. If you unavoidably have to work alone, or if a situation could pose a threat to you, your Manager will discuss with you arrangements for maximising safety. These arrangements may vary, depending on the circumstances, but may involve:

- Keeping the door locked at all times
- Not allowing access to anyone you don't know, or anyone who does not have a pre-arranged appointment
- Making sure you are fully aware of emergency procedures, e.g. in the event of a fire
- Not working alone if you have any medical condition which means that it is unsuitable for you to work alone
- Identifying potentially threatening situations in advance, so that the risks can be minimised
- Giving you telephone numbers to contact in an emergency
- Maintaining regular contact with you
- Ensuring that you have access to the first-aid kit

Visiting other places of work

If you visit other places of work on behalf of the Company you must comply fully with any further health and safety rules notified to you. You are responsible for obtaining these rules and complying with them.

Personal protective equipment

We will issue any necessary personal protective equipment to you, and you must use it: this may include helmets and gloves at events. You must not misuse any such equipment.

Risk assessments

We assess and monitor our workplace and operations to ensure that we are aware of any risks to the health and safety of those who may be affected by our activities.

Pregnant workers

If an employee formally informs us that she is pregnant, her Manager will conduct a Maternity Health Assessment and implement any necessary reasonable adjustments to accommodate her maternity at work.

Manual handling

We aim to ensure that you do not undertake any manual handling operations at work which involve a risk of injury. Where this is not reasonably practicable, we make an assessment of manual handling operations, and either eliminate the hazard or reduce it to an acceptable level. We also provide you with information, instruction and training as necessary. Make sure you follow these rules when lifting:

If the load is awkward or too heavy for you – get help.

- If a mechanical lifting aid is available and you are trained in its use – use it, or ask someone who is trained to do so.

Before you lift, check:

- Do you have adequate room to lift the object?
- Are there any sharp edges?
- Is there a clear path to your destination?
- Is there adequate room for you to put the object down?

When you are lifting, remember:

- Keep your back straight
- Tuck your chin in

- Keep your feet as close to the load as possible, slightly apart and one foot slightly more forward than the other
- Bend your knees and crouch to the object
- Get a firm grip using your whole hand, not just your fingertips
- Keep your elbows well tucked in
- Lift smoothly and move in a forward direction
- Make sure you can see where you are going at all times
- When you set the load down take care not to trap your fingers.



Human Rights Policy

Aim, Purpose and Scope

The purpose of this Policy is to communicate to MJD Group, its employees, customers, suppliers, stakeholder, and the communities where we operate, the ethical and social values we respect and seek to uphold throughout our business decisions, activities, and partnerships. As an umbrella policy, it is further unlined by the human rights-related policies and procedural instructions within the company. This Policy outlines the commitment of MJD Group to respecting human rights and values of Integrity, Respect, Colleagueship and Ownership, as reflected in the other MJD Policies and which are the unifying force within the organisation.

What are Human Rights?

Human rights are the basic rights and freedoms that belong to every person in the world. They are based on shared values of dignity, fairness, equality, respect, and independence. Within the UK these values are defined and protected by law.

Commitments and Principals

In line with the United Nations Guiding Principles on Business and Human Rights (UNGPs) MJD are committed to the United Nations Universal Declaration of Human Rights, the International Labour Organisation's (ILO) core labour standards and the ILO's Declaration on the Fundamental Principles and Rights at Work. MJD will:

- Commit to performing our business to the abovementioned standards of ethics in accordance with our values and the laws where we operate.
- Be open and fair in dialogue with all our stakeholders and commit to communicating effectively with external parties, ensuring there is trusted and accessible consultation mechanisms available.
- Work to address key issues relevant to our sector, business activity and supply chains including: modern slavery and exploitative labour practices, child labour, all forms of discrimination, fair wages, working hours and conditions, health, and safety, right to freedom of association.
- Continue to develop our due diligence processes to provide more insight to help identify risks and ensure we understand the best approaches to preventing and mitigating risks to people.
- Not tolerate, nor condone abuse of human rights within any part of our business or supply chains, and we will take any allegations of abuse seriously. As part of this we will work to ensure effective provision of remedy wherever human rights occur through company-based grievance mechanisms.

Implementation

Leadership and governance:

We recognise that our success is based on a corporate culture that embeds responsible business into everything we do, and our leaders are responsible for providing direction and clarity as well as role-modelling behaviour. We are working to integrate human rights considerations effectively into business decisions and this covers our own operations, as well as supplier and customer relationships. We are also considering human rights aspects in our internal risk governance processes, providing clear reporting lines to employees and suppliers.

Capacity building:

Adequate training of employees on human rights and all MJD principals and procedures is essential to our success in preventing and mitigating risks for violation of human rights. We will provide training to key employees responsible for ensuring we meet our commitments on human rights.

Due diligence:

We understand that human rights due diligence is an ongoing process that requires particular attention at certain stages in our business activities, such as when we form new partnerships, or our operating conditions change. Improving the accessibility and trust of our grievance mechanisms and ensuring rightsholders and stakeholders can help us identify, prevent, and mitigate risks and where necessary provide appropriate remedy for impacts that have already occurred. We are continually working to improve the scope, understanding and accessibility of our grievance mechanism so it is more widely used to support the reporting of human rights issues.

Driving forward change:

We believe working on human rights is a journey that constantly evolves and changes depending on emerging legislation, best practice, and world events. Therefore, we are always working to ensure continuous improvement in all areas.



Living Wage Policy

Introduction

MJD is committed to ensuring that all our employees receive a fair and equitable wage that reflects the cost of living in the United Kingdom. We believe that paying the living wage is not only the right thing to do but also contributes to the overall well-being and job satisfaction of our employees. This policy outlines our commitment to paying the living wage and the steps we take to implement and maintain it.

Living Wage Definition

MJD adheres to the definition of the Living Wage as set by the Living Wage Foundation, which is a rate that is independently calculated based on the basic cost of living in the UK. This rate takes into account essential expenses such as housing, food, and transportation.

Policy Statement

MJD is committed to the following principles in relation to the living wage;

- We will pay all our employees, including permanent, temporary, and contracted workers, at or above the current Living Wage rate as defined by the Living Wage Foundation.
- We will regularly review and update our wage rates to ensure that they remain in line with the Living Wage Foundation's recommendations. Adjustments will be made as necessary to maintain compliance.
- All employees will be treated equally in terms of pay, irrespective of their role or position within the company. There will be no discrimination in wage rates based on factors such as age, gender, race, religion, disability, or any other protected characteristic.
- We will provide clear information to all employees about their wage rates and any changes to those rates. This will be done in a transparent and easily understandable manner.
- MJD will encourage our suppliers and contractors to pay their employees the Living Wage. We will actively engage with our suppliers to promote fair wages throughout our supply chain.
- We will provide training and awareness programs for our employees and managers to ensure they understand the Living Wage policy and its importance.
- MJD Ltd will monitor compliance with this policy regularly and take corrective action if necessary to address any non-compliance issues.

Implementation

To implement and maintain our Living Wage Policy, MJD will;

- Conduct regular reviews of wage rates to ensure compliance with the Living Wage Foundation's recommendations.
- Provide wage information to employees in a clear and accessible manner.



Modern Slavery, Child Labour and Human Trafficking Policy

1.0 PURPOSE

The purpose of this policy is to support international efforts against slavery, child labour and human trafficking in conformance the UK Modern Slavery Act of 2015, and other applicable international laws.

2.0 SCOPE

This policy applies worldwide to all MJD Employees and Agents.

3.0 DEFINITIONS

The term “Employee” or “Employees” is specifically defined, for purposes of this policy, as: any personnel hired directly by MJD (regardless of status classification of full-time, part-time, temporary, contract, etc.); interns (even if an intern does not receive payment).

The term “Agent” or “Agents” is specifically defined as any hired personnel, consultants, independent contractors, subcontractors, and any others who act on MJD’s behalf. The term “slavery” includes all of the following: definitions provided in the UK Modern Slavery Act of 2015; definitions of “slavery” or “forced labour” any coerced or compulsory labour, servitude; indentured servitude; detained servitude; sexual exploitation; removal of organs; or securing labour or services by force, threat, or deception. The term “child labour” means hazardous labour or labour provided by a child below a basic minimum age. The following minimum age rules apply, with any conflict in application by MJD to be resolved by the higher age: minimum age specified in local law, 16 years, and 18 years for hazardous work., The term “human trafficking” is the recruitment, transportation, transfer, harbouring or receipt of persons by improper means (including but not limited to by force, abduction, fraud or coercion) for an illegal or improper purpose, including forced labour or sexual exploitation. Further, the definition of human trafficking includes transportation of humans in violation of applicable international laws and applicable country requirements, and includes human smuggling, regardless of the person transported giving consent at any point in time.

4.0 POLICY

Modern slavery is a crime and a violation of fundamental human rights. MJD is committed to the elimination of all forms of slavery and to the international effort to abolish child labour and human trafficking and has a zero-tolerance approach to such activities.

4.1 No Employee of MJD may hire child or forced labour or conduct or support human trafficking on behalf of MJD.

4.2 All Employees should be alert to any evidence of slavery, child labour or human trafficking in operations linked to our businesses. If an Employee suspects slavery, child labour or human trafficking, report your concerns immediately to your manager and to the Compliance

4.3 ERM expects and requires its Agents and Suppliers to follow the same zero-tolerance approach and will take steps to identify sources of slavery, child labour and human trafficking in our supply chain. Once identified, MJD will take steps to eliminate those relationships or activities from our business arrangements.

4.4 Student educational work experience that has been approved by MJD in accordance with the UK laws applicable at the time, is not considered child or forced labour.

4.5 Any Employee who breaches this policy or fails to report any breach they become aware of will be subject to appropriate disciplinary action up to and including dismissal.

5.0 PROCEDURE

All Employees will be registered in MJD's Human Resources Information System (HRIS) and contractors providing labour or services will be registered in MJD's Contractor Management System as that system is progressively rolled out globally.

MJD's hiring and contractor selection protocols must be adhered to but must meet the UK employment laws at all times.

All approval for student educational work experience must be obtained in writing from the Senior management team in advance of the placement.



Sustainable Procurement Policy

MJD are committed towards social impact and strive for sustainability across every function, including sourcing and procurement. Through this procurement policy, we intend to make our operations more sustainable by:

- Upholding the laws and regulations of the respective countries we operate in
- Endorsing highest standards of economic, social, ethical and environmental practices
- Identifying and moderating risks associated with our procurement process
- Communicating the policy with stakeholders (internal and external) and raising awareness among our suppliers

In accordance with our commitment to the highest standards, we also expect our suppliers to aspire to the same standards in their business operations, including but not limited to:

Environment:

- Comply and adhere to all the applicable environmental laws in respective countries/jurisdiction
 - a. Undertake initiatives to promote greater environmental responsibility such as:
 - b. Responsible waste management and disposal Reduction of greenhouse gas and other emissions harmful to the environment
 - c. Conservation of non-renewable natural resources

Business Ethics:

- Obey all relevant international and domestic laws regarding ethical business practices
- Demonstrate existence of procedures to prevent:
 - i. Money laundering –
 - ii. Fraud, bribery, corruption –
 - iii. Conflicts of interest –
 - iv. Data security issues

Labour and Human Rights:

- Comply with all applicable laws, in accordance with the principles of the International Labor Organization, the UN Global Compact and the UN Universal Declaration of Human Rights
- Prohibit slavery and the use of forced, bonded, or child labour across the supply chain
- Prohibit unlawful discrimination and harassment to provide a safe and inclusive work environment

Community Development:

- Provide employees with a living wage, at a minimum 2 Partner with the local governments and communities to improve the education, cultural, economic, and social well-being of communities which they operate in We understand that procurement performance improvement is a continuous process and recognize the contribution of our suppliers in our journey to become more sustainable.



Supplier Code of Conduct

INTRODUCTION

MJD Group (“MJD”) is committed to the highest standards of ethical conduct and social and environmental responsibility. We expect our Suppliers to meet the same standards in their business operations and, to have their own documented policies and processes in place addressing the matters detailed herein. Additionally, we expect our suppliers to hold their third parties to the same standards. Therefore, MJD has created this Supplier Code of Conduct (the “Code of Conduct”), which sets out the standards expected of any Supplier doing business with Bain.

“Supplier” means any firm, individual or third party that provides a product or service or undertakes any activity for or on behalf of Bain, either directly or indirectly.

“Supplier Representative” means any individual who works for a Supplier, whether under a contract of employment or any other contract (written or oral) where an individual undertakes to do personally any work or services for the Supplier and includes, without limitation, Supplier’s principals, officers, directors, employees and independent contractors.

1. SECURITY, DATA PRIVACY AND AI GOVERNANCE

DATA PRIVACY

Suppliers must comply with applicable privacy and data protections laws and regulations in the respective countries of operation, as well as comply with all information security laws, regulations and industry standards, secure MJD confidential data and individual personal data and prohibit its unauthorized access or use. Suppliers shall maintain internal policies and procedures reasonably designed to protect data provided by MJD or obtained by the Supplier on behalf of MJD. Suppliers shall comply with all applicable privacy, data protection and information security laws and regulatory and judicial requirements regarding the collection, storage, processing, transmission, or disclosure of MJD data.

SYSTEM AND NETWORK ACCESS

Access to MJD’s systems and data is restricted to only those systems and data that are approved by MJD and necessary to perform the agreed-upon services. Any Supplier Representative that is authorized to access Bain’s systems shall comply with Bain’s Acceptable Use Policy which will be provided to such Supplier Representative if and as applicable. Any attempt to access data not authorized to Supplier is a violation of MJD’s security policy.

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USE OF MJD PROPERTY

Each Supplier is responsible for the proper use of MJD property, and must safeguard it against loss, damage, misuse or theft. Any MJD property which is provided to a Supplier is for MJD

business purposes only. Personal use of MJD equipment such as phones and computers should be kept to a minimum. Any unauthorized duplication and use of software is a violation of copyright laws. All Internet, intranet and e-mail activities using MJD systems are to be conducted for legitimate business purposes that are directly related to the services Supplier is performing for MJD. Supplier may not post or discuss business information concerning MJD with the media or on the Internet.

AI GOVERNANCE

In alignment with MJD's commitment to responsible AI practices and adherence to applicable laws, we expect all suppliers to demonstrate a thorough understanding and compliance with AI regulations and our established responsible AI goals principles. Suppliers are required to establish robust processes for setting policies and ensuring accountability in the development and deployment of AI systems, reflecting our values of fairness, transparency, and accountability. This includes a commitment to using and/or creating AI technology in a manner that is both favourable and responsible, upholding ethical standards and minimizing potential harm. By adhering to these guidelines, suppliers contribute to the creation of an AI ecosystem that aligns with MJD's values and legal obligations.

2. ETHICAL STANDARDS

MJD will only work with Suppliers that conduct business with ethical standards that are consistent with our own. Supplier should abide by the following ethical standards and guidelines:

- Obey all relevant laws
- Treat each other fairly, with dignity and respect
- Prepare all records of financial transactions carefully and accurately
- Report financial conditions and results of operations, honestly and promptly
- Deal honestly and fairly with clients, customers, suppliers, and financial partners
- Avoid actual and potential conflicts of interest
- Avoid the improper giving and receiving of gifts
- Safeguard MJD's interests, assets and reputation
- Separate personal political activities from MJD's business
- Report observed violations of legal and ethical standards

ANTI BRIBERY AND CORRUPTION PRACTICES

MJD will only work with Suppliers who adhere to the high ethical standards in their business practices. Corruption, bribery, extortion, and embezzlement, in any form, are strictly prohibited. Suppliers shall not violate the any international anti-corruption conventions, and applicable anti-corruption laws. Suppliers shall not offer or accept bribes or other means to obtain an undue or improper advantage. Suppliers must uphold fair business standards in advertising, sales, and competition. Suppliers shall implement procedures to ensure its employees and suppliers comply fully with applicable anti-corruption and sanction laws and these standards.

GIFTS; CONFLICTS OF INTEREST

Suppliers and other third parties are discouraged from giving gifts to MJD employees. In all events, MJD employees must adhere our internal policies governing gifts from third parties, including approval requirements. MJD employees may not accept excessive gifts, gratuities or entertainment from any individual or organization with which MJD has business dealings and Suppliers shall refrain from giving any gifts, payments or the like that would, or could be perceived to violate this policy. Suppliers should further refrain from accepting or giving any gifts, favours, payments, entertainment, loans or the like with a purpose of obtaining any improper advantage or influence for the Supplier, MJD or any third party with any client, prospective client or other third party or that create any appearance of impropriety. Suppliers must disclose all potential conflicts of interest, including those in which the Supplier may have been placed inadvertently due to either business or personal relationships with customers, suppliers, business associates, or competitors of MJD, or with other MJD employees. Employees of the Supplier may not act on behalf of MJD in any transaction or business relationship involving themselves or members of their family, or other persons or organization with which they or their family have any significant personal connection or financial interest

FRAUD AND INVESTIGATIONS

The Supplier is expected to cooperate with any investigators, law enforcement and regulatory agencies in the event of any investigation of wrongdoing by the Supplier or others doing business with MJD. This cooperation includes reporting violations of the law and cooperating with law enforcement agencies in their prosecution efforts.

REPRESENTATION OF MJD

Supplier may not represent itself as an employee or agent of MJD or enter into any agreement on MJD's behalf or in MJD's name without prior written authority.

NO PUBLICITY

The Supplier must seek and receive approval from MJD, before publicly referring to MJD as a client or partner – whether online or offline .

3. HUMAN RIGHTS AND LABOR STANDARDS

PROHIBITIONS AGAINST DISCRIMINATION AND HARASSMENT

MJD does not tolerate unlawful discrimination or harassment in the workplace. All Suppliers must not engage in any unlawful discriminatory or harassing conduct. Discrimination or harassment based on race, colour, religion, national origin, citizenship, ancestry, gender (including pregnancy), gender identity, age, disability, marital status, sexual orientation, or other protected characteristic or status is strictly prohibited.

Sexual harassment is generally defined as unwelcome sexual advances, requests for sexual favours, or other visual, verbal or physical conduct of a sexual nature when: (i) submission to such conduct is made, either explicitly or implicitly, a term or a condition of employment; (ii) submission to or rejection of such conduct affects employment opportunities; or (iii) such conduct interferes with an individual's work or creates an intimidating, hostile, or offensive work environment. Examples of sexual harassment include, but are not limited to: sexual gestures, leering, or displaying sexually suggestive objects or pictures; derogatory comments, epithets, slurs, teasing and jokes of a sexual nature; graphic comments about an individual's sex life or

body; suggestive or obscene letters, e-mails, notes or invitations; and unwelcome physical contact.

MJD may, in its sole and absolute discretion, remove from our premises any Supplier who engages in offending conduct.

All Suppliers must promptly report any offending behaviour, whether such behaviour is directed to the Supplier or to any employees of MJD, to any member of the MJD management.

COMPLIANCE WITH EMPLOYMENT LAWS

Supplier shall comply with all laws applicable to its business wherever it is carried out within the World.

CHILD LABOUR

Suppliers are prohibited from using workers under the legal age of employment in any country or local jurisdiction where Supplier performs works. If the minimum age of employment is not defined, the minimum age of employment shall be 16 years of age. In cases where minors are authorized to work, we expect our Suppliers to observe all legal requirements, particularly those pertaining to hours of work, wages, minimum education and working conditions.

MODERN SLAVERY AND HUMAN TRAFFICKING

MJD condemns in the strongest terms, forced labour and human trafficking and is committed to ensuring that there is no part of this in any part of our global operations. In accordance with this Supplier Code of Conduct, we expect the Suppliers with whom we do business to uphold the same standards.

Suppliers are expected and required to conduct their business in accordance with all applicable laws, rules and regulations including, without limitation, those that relate to modern slavery and human trafficking, such as the United Kingdom's Modern Slavery Act 2015. Suppliers shall not and shall ensure that their employees and subcontractors or any person acting on their behalf do not, engage in any modern slavery practice, which practice may include slavery, servitude, forced or compulsory labour or the facilitation of the travel of another person with a view to that person being exploited.

Suppliers are expected to conduct proper and adequate checks on any agency or company providing labour, employees, contractors or other persons to the supplier, to ensure that such agency or company does not engage in any modern slavery practice. Suppliers will provide reasonable assistance and information to MJD to enable MJD to comply with applicable anti-slavery law, prepare a slavery and human trafficking statement if requested by MJD, and conduct due diligence to ensure that modern slavery practice is not taking place in the Supplier's business or supply chains.

Suppliers will keep detailed and accurate records as required by law showing all actions taken to prevent modern slavery practices and compliance with applicable anti-slavery laws by themselves and those in their supply chain. Suppliers shall, upon request by MJD, provide a director or officer's certification to MJD to confirm their compliance with applicable anti-slavery law. If suppliers fail to provide such a certification, MJD shall have the right to audit Suppliers' records and personnel to verify compliance with the applicable anti-slavery law or to cease working with that Supplier.

Suppliers are expected to warrant to MJD that they have not, and their officers, employees, agents, subcontractors and any other persons who may perform services for or on behalf of the Suppliers, have not (i) engaged in any practices that amount to modern slavery practices; (ii) breached, or caused any person to breach, any applicable anti-slavery law; (iii) been convicted of any offence involving modern slavery practice; or (iv) been the subject of any government or regulatory investigation or enquiry in relation to modern slavery or any offence under applicable anti-slavery laws. Suppliers are required to notify MJD immediately upon becoming aware of any breach or suspected breach of their obligations under this policy, or any potential non-compliance with applicable anti-slavery laws.

COMPENSATION AND WORKING HOURS

Supplier shall comply with the respective national laws and regulations regarding working hours, wages and benefits.

HEALTH & SAFETY

MJD expects its Suppliers to strive to implement the highest standards of occupational health and safety. Suppliers must comply with applicable occupational health and safety regulations and provides a work environment that is safe and conducive to good health, in order to preserve the health of employees and prevent accidents, injuries and work-related illnesses.

MJD maintains a drug and alcohol-free work environment. No Supplier or Supplier Representative is permitted to possess, consume, sell, or be under the influence of alcohol and illegal drugs (and legal drugs that are not used in a manner consistent with dosage requirements) while on any MJD facility (including our vehicles). Any Supplier found to be in violation of this policy may be removed from company premises and not allowed to re-enter. Firearms and any other weapons are not allowed on our facility and may not be carried when conducting any MJD business. Violent or abusive behaviour will not be tolerated. Any Supplier's Representative engaging in such conduct may be removed from the premises and not allowed re-entry.

DISCIPLINARY PRACTICES/COERCION

MJD firmly believes that everyone should be treated with dignity. Suppliers shall not inflict or threaten to inflict corporal punishment or any other forms of physical, sexual, psychological or verbal abuse or harassment on any employees.

FREEDOM OF ASSOCIATION

Supplier Representatives shall be free to join organizations of their own choice. Suppliers shall respect and recognize the right of employees to join and organize associations of their own choosing, and to bargain collectively. Employees shall not be subject to intimidation or harassment in the exercise of their right to join or to refrain from joining any organization.

4. ENVIRONMENTAL, SOCIAL AND GOVERNANCE

SUSTAINABILITY

MJD embeds our deep commitment to climate action in the core of all areas of our business and have set aggressive emissions reduction targets in line with Science Based Targets Initiative's 1.5°C pathway

MJD expects its Suppliers to conduct business in a responsible manner and incorporate the Sustainable Development Goals into their operations and other business relationships. Suppliers shall comply with all applicable environmental laws, regulations and standards.

In addition, Suppliers shall demonstrate they have policies and strategies to identify, prevent, mitigate and account for impacts on the environment in their own operations and their supply base. This shall include without limitation: improving sustainability practices, addressing energy and water usage, reducing greenhouse gas emissions, reducing waste and especially plastics, promoting environmental responsibility and awareness, incorporating eco-conscious decisions into the development of products and services, and incorporating environmental considerations into investment decisions where appropriate.

ASSESSMENTS

Upon request, Supplier will provide written information on its policies and practices related to compliance with the Code of Conduct through use of assessments or questionnaires. MJD is committed to working with Suppliers to ensure performance and compliance with this Code of Conduct and expects Suppliers to agree to work together with Bain to jointly address applicable and relevant topics. In the event of non-compliance with, or violation of the Code of Conduct, Bain may give the Supplier a reasonable opportunity to respond with proposed corrective actions, unless the violation is severe or incurable, or there is a violation of law. Bain may suspend or terminate its relationship with the Supplier and/or disclose the matter to the appropriate authorities if there is a violation of law.

5. COMPLIANCE

COMMUNICATION

Supplier will take appropriate steps to ensure that the principles of this Supplier Code of Conduct are communicated to their employees and throughout their own supply chains. Supplier should also take appropriate steps to ensure that the principles of this Supplier Code of Code are adopted and applied by their employees, suppliers, agents and contractors to the extent applicable.

ENFORCEMENT

If MJD determines that any Supplier has violated this Supplier Code of Code, MJD may either terminate its business relationship or require the Supplier to implement a corrective action plan.

REPORTING CONCERNS

Actual, or suspected, material violations by a Supplier of this Supplier Code of Conduct should be reported to MJD senior management in the first instance. Similarly, if you are a Supplier to MJD and suspect that any MJD employee, or anyone acting on behalf of the firm, has engaged in illegal or otherwise improper conduct, you should also report the matter to MJD senior management team.

CHANGES TO THE SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct may be revised or updated from time to time.

