

	Doc No:	JEG-CoC-002	
	Revision No:	3.0	
Ì	Effective Date:	23IUN2025	

Author	Patricia Delaney
Approver	Colin Salisbury
Quality Verifier	lan Davy

Contents

1.0	Introduction	2
2.0	Legal and Ethical Compliance	
3.0	Human Rights & Labour Practices	2
4.0	Health, Safety, and Wellbeing	2
5.0	Environmental Responsibility	2
6.0	Indigenous and Community Rights	2
7.0	Protection of Information and IT Security	3
8.0	Related Jones Engineering Documentation	3
9.0	Monitoring & Continuous Improvement	3
10.0	Reporting and Grievance	3
11.0	Breach	3
12.0	Corrective Action and Consequences	3
13.0	Acknowledgment	4
14.0	Amendment History	4



Doc No:	JEG-CoC-002	
Revision No:	3.0	
Effective Date:	23JUN2025	

Author	Patricia Delaney
Approver	Colin Salisbury
Quality Verifier	lan Davy

1.0 Introduction

- 1.1 The Jones Engineering group of companies ("Jones Engineering") is committed to conducting its business responsibly in accordance with all relevant laws and regulations, ethical business practices and sustainable supply chain management.
- 1.2 Jones Engineering expects its suppliers to fully comply with applicable laws and to adhere to internationally recognised environmental, social and corporate governance standards (ESG standards) in the countries and territories in which they conduct their business operations.
- 1.3 This supplier code of conduct ("Code") is guided by and aligned with the following non-exhaustive internationally recognised standards and frameworks:
 - OECD Guidelines for Multinational Enterprises
 - International Labour Organization (ILO) Conventions
 - United Nations Global Compact Ten Principles
 - United Nations Guiding Principles on Business and Human Rights
 - United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)
 - ISO 26000: Guidance on Social Responsibility
 - ISO 14001: Environmental Management Systems (where applicable)
 - UK Modern Slavery Act 2015
 - General Data Protection Regulation (GDPR)
 - Local and national laws applicable to Labour, Health & Safety, Anti-Bribery and Corruption, and
 Environment
 - Irish Criminal Justice (Corruption Offences) Act 2018
 - The UK Bribery Act of 2010, U.S. Foreign Corrupt Practices Act of 1977
 - Regulation (EU) 2016/679
 - Data Protection Act (UK) 2018
 - GDPR (Regulation (EU) 2016/679)
 - ePrivacy Directive (Directive 2002/58/EC)
 - Data Protection Act 2018 (Ireland)
 - NIS2 Directive (EU)

2.0 Legal and Ethical Compliance

2.1 Suppliers must comply with all applicable national laws and internationally recognised standards, including anti-bribery and corruption, fair competition, and data privacy regulations.

3.0 Human Rights & Labour Practices

- No forced or child labour
- Non-discrimination and equal opportunity
- Legal wages, fair hours, benefits
- Freedom of association and collective bargaining

4.0 Health, Safety, and Wellbeing

4.1 Provide safe working environments, ensure risk prevention, emergency preparedness, and provide proper PPF.

5.0 Environmental Responsibility

5.1 Comply with environmental laws, reduce emissions/waste, and manage hazardous materials responsibly.

6.0 Indigenous and Community Rights

6.1 Respect Indigenous Peoples' rights, including free, prior, and informed consent for operations impacting their land.



Doc No:	JEG-CoC-002	
Revision No:	3.0	
Effective Date:	23JUN2025	

Author	Patricia Delaney
Approver	Colin Salisbury
Quality Verifier	lan Davy

7.0 Protection of Information and IT Security

- 7.1 Suppliers are expected to maintain robust systems to protect sensitive information, including:
 - 7.1.1 **Protection of Intellectual Property:** Suppliers must respect and safeguard all intellectual property rights, including patents, trademarks, copyrights, trade secrets, and proprietary technologies.
 - 7.1.2 Any unauthorised use or disclosure is prohibited.
 - 7.1.3 **Protection of Personal Information:** Suppliers must comply with data protection laws such as GDPR and local equivalents. Personal data must be processed lawfully, securely, and only for legitimate business purposes.
 - 7.1.4 **IT Security:** Suppliers must implement adequate cybersecurity measures to protect information systems from threats including data breaches, unauthorised access, malware, and cyberattacks. This includes access controls, encryption, secure backups, and employee training.

8.0 Related Jones Engineering Documentation

- Code of Conduct Policies and Procedures
- Information Security Management Policy
- End User Security Policy
- Security Incidents and Breach Reporting
- Privacy Policy
- Data Retention and Management Policy
- Environmental Social and Governance (ESG) Framework
- Modern Slavery Policy
- Responsible Business Policy
- Responsible Sourcing Policy
- Anti-Bribery and Corruption Policy
- Gifts and Hospitality Procedure
- Standard Conditions For Purchase of Goods and/or Services
- Subcontract Agreements

9.0 Monitoring & Continuous Improvement

9.1 Allow for audits, address any non-compliance, and strive for ongoing improvement in all areas of responsibility.

10.0 Reporting and Grievance

- 10.1 Suppliers shall provide employees and third parties with access to adequate reporting channels to seek advice or raise legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting.
- 10.2 Suppliers shall not penalise or otherwise retaliate against any worker who has reported breaches of this Code.
- 10.3 Reports may be made anonymously where legally permitted.

11.0 Breach

- 11.1 Suppliers shall promptly report to Jones Engineering notice of known breach of this Code and implement a corrective action plan to cure all non-compliance within a specified time (furnished to Jones Engineering in writing).
- 11.2 Suppliers shall also ensure that their suppliers, vendors, contractors, consultants, employees and other third parties comply with this Code when providing goods or services to Jones Engineering.

12.0 Corrective Action and Consequences

12.1 Failure to adhere to this Code may result in corrective action, up to and including termination of the business relationship.



Doc No:	JEG-CoC-002	
Revision No:	3.0	
Effective Date:	23JUN2025	

Author	Patricia Delaney
Approver	Colin Salisbury
Quality Verifier	lan Davy

13.0 Acknowledgment

- 13.1 This Code sets forth the standards and expectations for ethical and responsible conduct from all suppliers, vendors, contractors, consultants, and other third parties ("Suppliers") who provide goods or services to, or on behalf of, Jones Engineering.
- 13.2 This Code sets out the minimum ethical standards that Suppliers must follow.
- 13.3 This policy applies to all Suppliers globally, including their employees, agents, and subcontractors.
- 13.4 If a Supplier becomes aware of any events which raise doubts as to the quality, safety, efficacy, etc., of the supplier's products or services, the Supplier shall promptly disclose appropriate and sufficient information to Jones Engineering.
- 13.5 If there is a conflict between the provisions of this Code or any agreement with a Jones Engineering company, and any applicable laws, then the Supplier shall meet the most stringent standard.
- 13.6 By conducting business with Jones Engineering, the Supplier agrees to comply with this Supplier Code of Conduct and all Jones Engineering <u>Terms and Conditions</u>.

14.0 Amendment History

Date	Revision	Reason	Author
21NOV2022	2022 1.0 • First Issue of procedure		Gareth Kavanagh
25OCT2023	2.0	 Changed from a Controlled Form to a Code of Conduct Section 10. Titled "Supplier Declaration" has been removed Minor grammar updates 	Brian David
20JUN2025	3.0	 Document Number changed from QSP08.CoC-001 to JEG-CoC-001 Document reformatted throughout Addition of Standards/regulation in Section 1.3 Addition of Section 8.0 Related Documentation Additional information added in Section 13.0 	Patricia Delaney