

Corporate and Social Responsibility Policy

We are committed to providing a safe, reliable and innovative service for all our clients and customers.

Corporate Social and Responsibility is about how we achieve this and how we do business. It is about how we manage our people and the environment and engage with the community thus ensuring that we successfully deliver the services our clients and customers needs today and in the future. It is also about seeking the partnerships and policy support that allow us to develop a better and more sustainable business.

This is applicable to all Divisions in MJF Group Ltd.

We have therefore determined to bring together our existing operating principles into one framework policy under the heading of Corporate Social Responsibility. The principles encompassed in this policy cover all areas of the Group's operations and have been developed and continue to be reviewed against and updated by reference to relevant codes of corporate governance and international standards including the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the UN Convention against Corruption.

The MJF Group Ltd Board of Directors supports the principles set out in those codes and standards and the aim of this policy is to translate that support into a set of guidelines and standards that set a common approach for MJF Group Ltd companies and provide practical guidance for our managers and employees on the ground.

Compliance, monitoring and reporting

Compliance with this policy will be continuously monitored and subject to review by the Board of MJF Group Ltd. Each local manager is responsible for ensuring that the principles set out in this policy are communicated to, understood and observed by all employees and for ensuring compliance in their area of responsibility. Employees who reasonably suspect that there has been a breach of this policy must report it to their line manager, senior management, or other mechanisms established by the Group to report such breaches. We recognise that employees may be reluctant to report concerns for fear of retaliation and will take disciplinary action against any employee who threatens or engages in retaliation, retribution or harassment of any person who has reported or is considering reporting a concern in good faith.

The Board of MJF Group Ltd will not criticise management for any loss of business resulting from adherence to the principles set out in this policy. All sections of this policy are underpinned by the Group's Code of Business Ethics, which is set out in Section 1. The other areas covered by this policy are Section 2 Health and Safety and Section 3 Security, Employment (Section 4), Customer and Community (Section 5) and Environment (Section 6).

This Code of Business Ethics sets out the standards we expect from our employees in their internal and external dealings with colleagues, customers, stakeholders and third parties.

1. Code of Business Ethics

Basic Standards of Conduct

- We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties.
- We will respect the legitimate interests of third parties with whom we have dealings during our business.
- We will maintain the highest standards of integrity - for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

Employees

We are committed to:

- Developing a workforce where there is mutual trust and respect, free from bullying and harassment, where every person feels responsible for the performance and reputation of our company.
- Respecting the rights of individuals their customs and traditions and their right to freedom of association and the right to decide whether to join a trade union. We will negotiate in good faith with properly elected representatives of our employees.
- Recruiting, employing and promoting employees based on objective criteria and the qualifications and abilities needed for the job to be performed in line with our Equal Opportunities Policy.
- Maintaining good communications with employees through our information and consultation procedures.
- Providing our employees with suitable training and assisting them in realising their potential.
- Ensuring the privacy and confidentiality of our employees' personal information is respected.
- Suitably rewarding our employees for their contribution to the success of the business.
- Providing mechanisms whereby employees can raise legitimate concerns confidentially regarding malpractice and ensuring no one will be victimised for a report made in good faith.
- Providing employees with the appropriate information and training to comply with this Code and the associated policies
- Seeking to protect our employees from third party abuse that might be injurious to their safety, health or well-being.

Business Integrity

- We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.
- In those dealings, we expect those with whom we do business to adhere to business principles consistent with our own.
- We will conduct our operations in accordance with the principles of fair competition and applicable regulations.
- MJF Group Ltd's accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- No unrecorded account, fund or asset will be established or maintained.
- We will comply with the laws and regulations applicable wherever we do business. We will obtain legal advice where felt necessary to comply with this commitment.
- We will review and track our business risks including social and environmental risks.
- MJF Group Ltd will not facilitate, support, tolerate or condone any form of money laundering.
- We will ensure that our business is run in an ethical and effective manner we will maintain internal controls in line with MJF Group Ltd's minimum standards of business control.

National and International Trade

- We will seek to compete fairly and ethically within the framework of applicable competition and anti-trust laws and we will not prevent others from competing fairly with us.
- We will comply with all applicable export control laws and sanctions when conducting business around the world.

Personal Conduct

- All employees are expected to behave in accordance with the principles set out in this Code of Business Ethics.
- Employees are expected to protect and not misuse company assets such as buildings, vehicles, equipment, cash and procurement cards.

- Employees are expected to use e-mail, internet, IT and telephones in a manner appropriate for business purposes in line with the principles contained in this Code and any applicable IT policies.

Bribery

- No MJF Group Ltd employee, individual or business working on our behalf must accept or give a bribe, facilitation payment or other improper payment for any reason.
- This applies to transactions with government officials, any private company or person anywhere in the world. It also applies whether the payment is made or received directly or through a third party.
- MJF Group Ltd shall ensure that adequate procedures are in place to prevent the risk of bribery and that these are effectively communicated and implemented across the Group in line with the requirements of the Bribery Act 2010.

Gifts, Entertainment and Improper Payments

- Accepting or giving any entertainment or gift that is designed to, or may be seen to influence business decisions, is not acceptable. No MJF Group Ltd company or employee shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain.
- If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager or Group Administration Manager.
- Any gift or hospitality given or received by an employee should be reported. In the UK this applies to any gift or hospitality with an estimated or actual value of £50 or more.

Conflicts of Interest

- Whilst we respect the privacy of our employees, all MJF Group Ltd employees are expected to avoid personal relations, activities and financial interests, which could conflict with their responsibilities to MJF Group Ltd.
- MJF Group Ltd employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.
- All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with an employee's line manager.
- There should be no unauthorised disclosure of price sensitive information to third parties.

For further specific information see the **Bribery and Corruption Policy**.

Confidentiality

- Information received by anyone during his or her employment must not be used for personal gain or for any purpose other than that for which it was given.
- Where confidential information is obtained during business that confidentiality must be respected.
- For information see our **Confidentiality Policy**

Political Activity

- MJF Group Ltd does not make any donations to political parties or take part in party politics. However, when dealing with Government we do make legitimate concerns known and will seek to influence Governments in relation to issues that could affect us, our shareholders, our customers or the local community. These relationships are conducted in accordance with this Code.

Health and Safety

- We are committed to creating and maintaining a safe and healthy working environment for our employees, customers and the community.
- Our commitment to ensuring the safety and security of our employees is set out in our **Health and Safety Policy** and **Security Policy**.

The Environment

- MJF Group Ltd is committed to making continuous improvement in the management of its environmental impact as set out in our **Environmental Policy**.
- All employees are expected to adhere to the requirements of the local environmental management system and support the improvement in our environmental performance.

Customers

- MJF Group Ltd is committed to providing safe, value for money, high quality, and consistent, accessible and reliable services to its customers.
- All employees are expected to behave respectfully and honestly in all their dealings with customers in accordance with the principles set out in this Code.
- We will safeguard and protect the welfare of vulnerable people who meet our employees. Employees will be made aware that they hold a position of trust and that they must always maintain the highest standards of personal conduct that reflects this trust being placed with them.

Safeguarding

- MJF Group is bound by 'The Safeguarding Vulnerable Groups Act 2009' as it operates a range of services that may bring members of its staff and subcontracted personnel into contact with Children, Young People or Vulnerable adults.
- It recognises that a written policy and specific procedures are required to enable that 'safeguarding' is achieved with understanding, uniformity and clarity. This vulnerability may be due to age, disability or illness. This is set out in our **Safeguarding Policy**.

Shareholders

- MJF Group Ltd will conduct its operations in accordance with the principles of good corporate governance.
- We will provide timely, regular and reliable information on the business to all our shareholders.

Supply Chain

- We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on many key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business.
- Whilst we are committed to obtaining and retaining competitive goods and services, we will at the same time seek to ensure they are from sources that have not jeopardised human rights, safety or the environment.
- We expect our suppliers to adhere to business principles consistent with our own. We expect them to adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, and human rights, social and legal standards in line with our Supplier Code of Conduct.
- We will seek to work with our suppliers to develop long-term meaningful relationships to benefit both parties with the aim of improving the quality, environmental performance and sustainability of goods and services.

Community Involvement

- Our operations touch members of the community daily, whether as customers, neighbours, employees, businesses or residents. We are committed to fostering good relationships with the communities in which we work and building community partnerships that deliver positive change.

2. Health and Safety

At MJF Group Ltd we are committed to maintaining the health and safety of all our employees, safety of our customers and safety of others affected by our businesses. For further details refer to our **Health and Safety Policy Statement** or **Health and Safety Policy**

Responsibility

Health and Safety is the responsibility of every employee and working safely is a condition of employment. Managing Directors, Group Directors, Managers and Personnel must ensure that all their staff are always safe by ensuring:

- Our Health and Safety processes are properly organised and appropriately resourced
- Staff are given information, instruction and training on risk assessment and appropriate aspect of Health and Safety
- There is full compliance with Health and Safety laws and Group policies on Health and Safety; and
- Performance targets are set for continual improvement for a reduction of accidents.

Monitoring and reporting

We will monitor progress on Injury Prevention in all our operations and will conduct periodic audits to assess performance. In addition:

- The Health and Safety Management Review will receive and review a report from each of the Divisions at its annual meetings
- All incidents will be reported promptly to our HSEQ Advisor and reviewed for future action.

3. Security

Security is a key issue for our Clients, our staff and our business. We recognise the range of security issues which can arise and have implemented the following high-level security policy.

The Board of Directors of MJF Group Ltd is committed to ensuring, so far as is reasonably practicable, the security of our employees at work and our property.

The threats to security are wide-ranging, significant and, in the main, driven by external influences. The ability to control risks varies. However, we can address or mitigate all the threats which apply. To be successful in this we need the co-operation and engagement of all our staff Clients.

Security is an area in which we seek continuous development and improvement and compliance with existing and emerging legislation. We will heighten the profile of security to ensure all members of staff understand why they should and how they can play their part.

Our efforts will bring greater personal and corporate security and business benefit. This statement provides guidance and direction to all employees on what is both required and expected of them. We are confident our staff will appreciate the reasons for this and the benefits to them, their colleagues, our clients and our property.

We aim to achieve, so far as is reasonably practicable: -

- A secure environment for staff in their work
- Security of our property
- Security of our systems and processes
- We will develop systems to monitor our performance on security within our operations. All operations will be subject to periodic inspection and review.

Further details can be found in our **Security Policy**.

4. Employment

In formulating its employment policies, MJF Group Ltd is guided by the framework established by the Organisation for Economic Co-operation and Development (OECD) in its Guidelines for Multinational Enterprises. These Guidelines encourage companies to foster openness, sustainability and respect for employee rights. Our employment policies cover all employees of MJF Group Ltd and its subsidiaries.

Equal Opportunities and Diversity Policy

- The Board of Directors of MJF Group Ltd is committed to equality of opportunity both in the provision of services to the public and as an employer. This policy sets out MJF Group Ltd's commitment to treat equally and with fairness always its employees, customers, contractors and those who meet the company.
- We are committed to seeking continuous improvement and compliance with legislation based on the following principles.
- Everyone has the right to be treated with dignity and respect.
- We will not discriminate on the grounds of race, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status, trade union activity or any other factor.
- We will adopt fair and inclusive practices throughout our operations and will seek to eliminate all prejudice, discrimination, bullying and harassment.
- All employees have a personal responsibility for the practical application of this policy in their day-to-day activities and must support the policy always.
- Non-compliance with this policy will be treated seriously and will not be tolerated.
- The Board of Directors of MJF Group Ltd and the Managing Directors and Presidents of our separate business units are required to ensure:
 - They create a productive and safe working environment, promoting diversity and inclusion in their workforce;
 - They develop new practices, as appropriate, to ensure all employees, contractors and customers are treated fairly; and
 - They can demonstrate continuous improvement in practices to promote diversity and equal opportunities for all.

Legislation and Codes of Practice

We will comply with and exceed where possible, current national and international legislation and relevant codes of practice in the countries where we operate. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

Partner Organisations

We are committed to actively working with partner organisations to ensure our policies, procedures and practices are in line with best practice.

Practices and Standard Operating Procedures

Each division and operating company will put in place practices and standard operating procedures to ensure the commitments in this policy are applied and implemented throughout the organisation.

Access to Company Premises

We will take all reasonable steps to ensure that our buildings and premises are accessible to disabled employees, customers and visitors as required by the Disability Discrimination Act (DDA) in the United Kingdom.

Access to Information

We will seek to ensure that information is made available to our customers and employees in alternative formats as required.

Recruitment

All recruitment will be carried out with fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and we will endeavour to ensure there are no barriers to employment of suitable candidates.

Staff Training

We will provide our staff with the necessary guidance and training to ensure the effective implementation of this policy and to ensure we are an inclusive employer and service provider. For further details see our **Training Policy**.

Complaints

Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimisation has the right to pursue the complaint through our grievance procedures.

Clients and customers who feel they have grounds for complaint may pursue these through our operating company customer complaints procedures.

Reporting

We are committed to monitoring and reporting on our actions and achievements in relation to implementing this policy both internally and externally.

Audit

We are committed to ensuring that our operations comply with the requirements of this policy and will periodically audit its implementation

5. Human Rights

MJF Group Ltd supports the principles of the United Nations Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We will adhere to the following principles in respect of our staff.

- We will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with law and will be given appropriate job skills training.
- We will support the individual's right to come together with other individuals and collectively express, promote, pursue and defend common interests.
- We will pay a fair wage reflecting local markets and conditions. We will always meet the national minimum wage.
- Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.
- We will not employ illegal child labour, forced or bonded labour or condone illegal child labour.
- We will abide by the non-discrimination laws where we operate.
- We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.
- We have formal grievance procedures through which staff can raise personal and work-related issues.
- All staff will be given reasonable access to bathroom and rest facilities.

Data Protection

We will comply with the relevant principles governing data protection in each country in which we operate.

Customers

Delivering our promise to our customers is one of our core values. Our commitment is to provide safe, reliable, customer focused, innovative and sustainable services.

We will:

- act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our services
- respect the human rights of our customers
- ensure our security and revenue protection
- on arrangements are consistent with international standards for law enforcement
- provide transparent and effective procedures that address customer complaints and contribute to fair and timely resolution of disputes without undue cost or burden
- not make representations or omissions nor engage in any other practices that are deceptive, misleading, fraudulent or unfair
- respect customer privacy and provide protection for personal data in accordance with the law.

Stakeholders

We are committed to maintaining open and regular dialogue with all our stakeholder groups in matters that affect their interests.

Community

Through our community strategy, we engage with the community at a range of levels as customers, neighbours, potential employees, and businesses.

Our strategy incorporates the following elements:

- Offering employment opportunities to all sectors of the community through non-discriminatory policies
- Promoting engagement between our staff and the community;
- Supporting local community groups and charities;
- Improving the environment in and around our operations;
- Promoting broader opportunities for workplace learning;

In addition, we provide support to community-based charities and projects in their respective areas including support for employees' efforts in fund raising and for small-scale projects.

6. The Environment

Through our core business activities, we are committed to providing good quality, reliable and cost-effective services to all our customers. At the same time, we recognise the environmental impacts arising from our business activities and are committed to reducing these through effective environmental management.

Our policy is to strive to achieve continual improvement in environmental performance.

We are committed to:

- preventing pollution and reducing the overall impact of our operations on the environment
- maintaining an internal management structure for the management of environmental issues which includes clearly defined responsibilities for environmental management capable of delivering this policy commitment
- complying with, and where possible exceeding applicable legal and other requirements relating to the organisation
- monitoring our environmental performance and setting objectives and targets for improvement
- providing appropriate training and awareness programmes for our staff

We recognise the key role we must play in both reducing and contributing to greenhouse gas emissions from the surface transport sector.

Our commitment in this area is set out in our **Environmental Policy** and the acquisition of **ISO 14001:2015**

Climate Change Policy

Climate change has now been recognised as an international issue with national governments acting to reduce greenhouse emissions. Transport is our primary environmental impact use and we recognise that we emit greenhouse gases from operating our vehicle fleet. We are committed to reducing the greenhouse gas emissions from our operations in a way which supports national government strategies and in line with our commitment to our clients to provide safe, efficient and reliable services.

Our key climate change commitments are:

- To assess the potential impact to our business from evolving climate change policies as part of our on-going risk management processes.
- To work actively with our suppliers to improve the fuel efficiency of our vehicles.
- To report annually on our greenhouse gas emissions as accurately as we are able and to continue to seek to improve the scope and accuracy of reporting over time.
- To actively promote improved energy efficiency and fuel efficiency within our business.
- To stay abreast of alternative fuel developments and continue to assess their commercial viability.

Biodiversity Policy

Our policy in respect of conserving and promoting biodiversity reflects our commitment to furthering the aims of sustainable development in the management and development of our business. All businesses affect biodiversity using resources and discharge of waste products.

This Biodiversity Policy is therefore consistent with our broader Environmental Policy, which includes a stated commitment to minimise the environmental impacts of our operations and prevent pollution.

Our policy is to strive to enhance biodiversity where practicable.

Accordingly, our commitments are:

- Where we operate from sites which are designated as being of importance due to their natural habitats, we will work with the relevant authorities and affected parties to ensure protection of these habitats through effective pollution control measures and management plans with the aim of conserving or enhancing the biodiversity of these sites.
- Where we are involved in the development of new sites, we will comply with all relevant statutory requirements and guidelines in respect of designated areas on any of our development sites. Where significant areas of landscaping are proposed, we will aim to promote biodiversity through, for example, sensitivity of planting taking account of any local biodiversity networks or action plans.
- Where we operate from existing sites the potential to promote biodiversity is likely to be limited. The nature of the operations conducted at our sites is such that they are largely covered in hard standing. We will however seek to identify any sites where the potential exists for enhancing biodiversity and over time develop appropriate actions plans to achieve this.
- Where we consider it appropriate to do so, we will support the implementation of the UK Biodiversity Action Plan and Local Biodiversity Action Plans defining areas which require special protection and management to ensure that biodiversity is maintained. We will seek to do this in partnership with the relevant authorities and affected parties, who promote biodiversity on a local and national level and seek to identify ways in which we may be able to support the development of selected schemes or initiatives.

Signed...



John Power
Managing Director
Dated: January 2022