

Code of Business Ethics

Our code: Our responsibility

August 2019

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Overview

An introduction from our Chief Executive

Dear Colleague,

Network Rail's permission to exist and operate depends on us all maintaining the highest standards of business behaviour and acting with integrity in everything we do.

Honesty and integrity is about more than just our company's image; it is about sustaining a place where we are all proud to work. Ultimately, it's about each of us knowing that we have done the right thing. This means acting honestly and treating each other and our customers, partners and suppliers, fairly and with respect.

Our Code of Business Ethics sets the standard of behaviour that is expected of all of us. It helps us all make the right decisions when the correct course of action may not always be clear, and outlines how we should deal with situations that might be damaging to each other or to our company. It's a set of core principles that apply to us all, and will continue to do so, as we devolve.

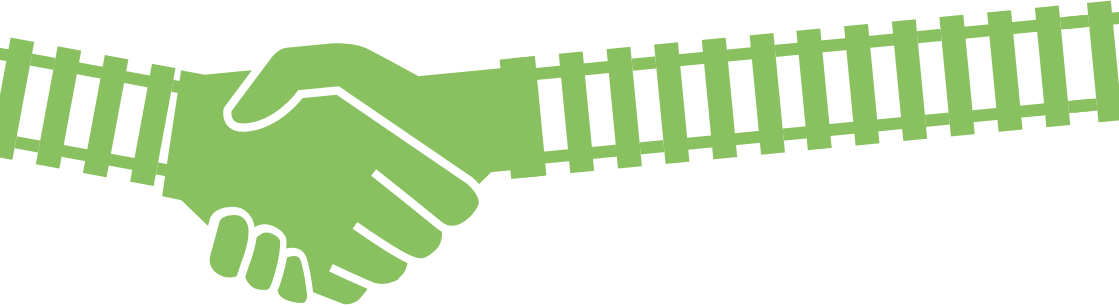
Breaches of this Code and any of its supporting policies will be taken seriously so please speak out if you are concerned about anything. If you raise a genuine concern – even if it is not confirmed by subsequent investigation – then you can be confident that there will be no action taken against you for doing so.

I am committed, together with my Executive Leadership Team, to working in accordance with this Code at all times. Working in an ethical way will help us be safer and perform better. It's central to how we conduct ourselves every day in the workplace – no matter where we do our job, so please take time to read this Code and understand how it applies to you.

Thank you

Andrew Haines,
Chief Executive

Our responsibilities



Complying with this Code and its supporting policies is a requirement of working at Network Rail, and you are responsible for asking questions if you need clarification or advice.

Network Rail expects us all to behave with the highest standards of integrity in business and commercial relationships. We treat our colleagues and anyone we have dealings with in a fair and open way. We don't do anything that may damage Network Rail's reputation or bring the business into disrepute and there is absolutely no place for deception, bribery or fraud in our company.

We all have a responsibility to read and understand this Code, and to understand and comply with the policies, standard working procedures and safety rules relevant to our job.

To help us, mandatory ethics training is available in a range of formats, and the supporting policies are listed in this Code. This list is not exhaustive.

Failure to comply with this Code and its supporting policies will be taken seriously. Breaches will be investigated by the business integrity department, and could result in disciplinary action, up to and including, dismissal. Where a criminal offence has been committed, the police will be involved.

Doing the right thing...

Business ethics are the set of principles that guide everyone who works in or for our company, whether an employee, a contractor or a supplier. They include what the law requires of us, as well as how we behave and make decisions, both as individuals and as an organisation.

Working in an ethical way means we are selfless, objective, accountable, open and honest, and demonstrate integrity and leadership. We should all behave in a way that meets these high standards. Government and the taxpayer trust us with significant resources, and it's up to each of us to respect this trust and use these resources properly and efficiently.

Sometimes this means we might have to make difficult decisions. This Code is here to help us make the right ones.



...even when no one is looking

We should be open and honest in all our dealings, whether with colleagues, suppliers, customers, passengers or lineside neighbours. We must declare on iEthics any private interests that could affect how we do our role, and we should expect the decisions we make to be scrutinised. It's important we don't put loyalty to colleagues above behaving in the right way, and we must never seek personal gain at the company's or anyone else's expense.

We often experience ethical dilemmas in our everyday lives.

Think about the following scenario. What would you do if it was you?

You're reversing into a tight parking space. When you get out, you see you've clipped the car in the next space.

There's nobody around. What do you do? Report it? You're already running a bit late for an important appointment. Would that affect your decision?

The other car's not in great condition: there are quite a few dents and scratches to the paintwork already. The owner probably wouldn't notice, so maybe there isn't any point in reporting it?

However, you also see a CCTV camera overhead. So perhaps you've been captured on film? How would this affect your choice? Would this affect your decision to report it... or would you just hope for the best?

Now put yourself in the shoes of the other driver. What would you want to happen here?

The five questions

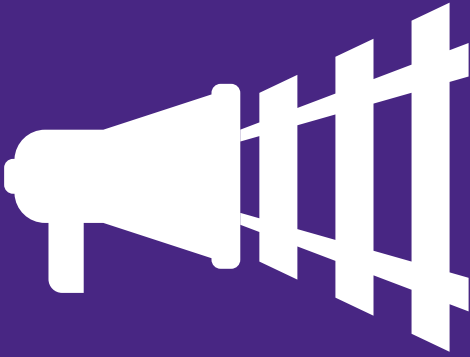
This Code explains how we should approach a range of situations we may find ourselves in at work.

If you're faced with a situation not covered by this Code or the policies it refers to, and you're not sure whether your proposed course of action is the best one, ask yourself the following questions:

- 1 Is it legal?
- 2 What would my family think if I acted a certain way?
- 3 Would it appear fair to my colleagues and manager?
- 4 If it were a story in the newspapers how would it portray both me and Network Rail?
- 5 How would I feel if it happened to me?

If the answers to any of these questions make you feel uncomfortable you should not proceed, instead seek further guidance.

Got a question? Facing an ethical dilemma? Get in touch with the ethics team
ethics@networkrail.co.uk



How we can Speak Out

It's important that we all take responsibility for reporting breaches of the Code, our business policies, or wrongdoing.

If you're worried about an ethical issue, you should first talk to your line manager, or another senior Network Rail manager.

If for whatever reason you don't want to do that, you should use the confidential Speak Out service or contact the ethics team at ethics@networkrail.co.uk

All concerns raised under our Speak Out (whistleblowing) policy will be treated fairly and if you make a concern known honestly, even if it is not confirmed by subsequent investigation, no action will be taken against you.

See our Speak Out (whistleblowing) policy for more information.

Access Speak Out by calling **0808 143 0100** or visiting www.intouchfeedback.com/networkrail –

The service is available 24 hours a day, 365 days a year and you can make a report anonymously, if you wish.



Dealing with safety concerns



We're committed to getting everyone home safe, every day.

We're all responsible for working safely so that our employees, the public, our customers, contractors and suppliers aren't put at risk when using or working on the rail network.

Always follow our Lifesaving Rules whether you are working on the track or in the office.

Always report events that have the potential to cause injury or damage through the Close Call system. This way we can learn from our near misses and prevent similar things happening again.

You can report a Close Call by phoning: **01908 723 500** or through the Close Call app.

You can also report your safety concerns through CIRAS, the rail industry's confidential incident reporting system:

Telephone: 0800 4 101 101

Text: 07507 285 887

Post: Freepost CIRAS

Web: www.ciras.org.uk

If you have a safety concern, stop work immediately, ensuring that doing so does not endanger others, move to a position of safety and contact the person in charge, explaining why you have stopped the work. If the safety of trains could be affected you must contact the signaller immediately.

Q Your colleague regularly calls in sick on Mondays, disappears at lunchtime and makes mistakes at work. They insist that they are fine, but you're worried they have an alcohol problem. Is it any of your business?

A Yes, it is your business. A mistake at work or driving could hurt them, their colleagues, or even passengers or the public. Talk to them, try and encourage them to talk to their manager, with your support if needed. If they are unable to speak up, talk to your manager or to HR.

Q You recently tripped over some loose floor covering in an office. You didn't hurt yourself, but someone mentioned that you should Close Call it. It seems silly, when safety is all about keeping trains running safely?

A Safety is vital to all of us, everywhere, every day at Network Rail. Something that might seem minor to you could be dangerous to others or could result in a serious accident. Slips, trips and falls can result in surprisingly serious injuries and long periods of time off work for an individual and disruption for their team. Always report safety concerns via Close Call, even if they seem trivial, so they can be put right.

A spotlight on...

There are certain areas in which it's particularly important we make the right decisions every day. This section looks at them in more detail.

Bribery

Bribery means trying to influence a business decision or making it easier to do a piece of work by offering or receiving cash, gifts or other incentives, either directly or through someone else.

Bribery can take various forms and can include gifts, hospitality, personal benefits and cash. We all need to be mindful of the intentions of external parties when they offer us anything, especially when we're in the process of awarding contracts or making important business decisions.

Network Rail operates a zero tolerance approach towards bribery. Employees found to be in breach of our Anti-Bribery policy will face disciplinary action and possible fines and/or imprisonment under the UK Bribery Act 2010.

From time to time we work abroad. That doesn't change our position on bribery – we're bound by UK law and must comply with them wherever we operate.

See our [Anti-Bribery policy](#) for more information.



Q You have notified some local residents that you are doing work at night. One of them offers you and your team a few crates of beer to get it re-scheduled to take place when they're on holiday. What should you do?

A Apart from the obvious difficulties of getting the work moved, you should never accept a bribe from anyone, no matter who they are or what position of power or influence they seem to hold. It's illegal and you could be guilty of a criminal offence. Decline the offer, tell your line manager, record the incident on iEthics and report via Speak Out.

Q You are managing the letting of a new contract to replace some vehicles for your maintenance teams in the route. One of our suppliers sends you an iPad and £250 of Apple store vouchers to your home – what should you do?

A There are a few things. First, tell your line manager. Then record the gifts on iEthics so there's a record of you having been sent them and return them to the supplier. Accepting may be seen as an inducement or a bribe and may put the integrity of the tender process in doubt. You should also report this via Speak Out.

Fraud

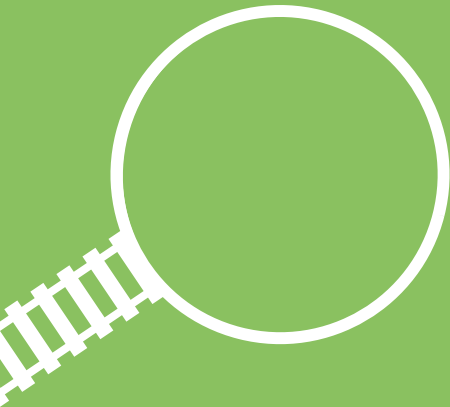
Fraud is an act of dishonesty intended for personal gain or to cause loss to another party. This could range from misuse of resources or purchasing cards, falsifying timesheets or fraud in procurement activities.

We must never abuse our position to make a personal gain or cause loss at the company or anyone else's expense. If evidence of potential fraud is identified the individual involved will be subject to disciplinary action.

If you suspect fraud you should report your concerns via the Speak Out service or any of the other channels listed on page nine of this Code.

Q You notice that your colleague frequently leaves work early. You know he has two young children and a partner that has recently become ill and is unable to work. His timesheets always show a full working day even though they leave at least an hour early on most days. You decide to say something, but he just tells you that he really needs the extra money. Should you tell your line manager if it continues?

A It is really important that you tell your line manager or another senior manager about your concerns. If you don't want to do that, use the confidential Speak Out service. There may be a straight-forward solution – your colleague's change in circumstances could mean a flexible working pattern is appropriate. However, if someone persistently falsifies timesheets they are committing fraud, and will face disciplinary action by Network Rail, which could result in dismissal.



Gifts and hospitality

Gifts and corporate hospitality are anything offered to you by someone outside of Network Rail because of your position. It can also cover anything offered by you to someone outside of the company.

All offers of gifts or hospitality, both by and to you, must be registered on iEthics. The only exception to this rule is when you're offered items with an approximate value of £15 or less.

Gifts and hospitality may include items ranging from diaries and mugs, to tickets to events and free travel and accommodation.

Hospitality is only appropriate where it's necessary for the development of legitimate business relationships. There should always be a clear business rationale for accepting or offering it. It should always be modest in value, timed appropriately and must be recorded and approved through iEthics beforehand. You should also consider how the situation might look to the outside world. Hospitality involving sporting events should not be accepted under any circumstances.

Not handling situations in this way could make gifts or hospitality look like an attempt to influence decisions – and in some instances – could even be seen as a bribe.

Q You work closely with a local supplier who has given you and your family tickets to a charity event. Is it OK to go?

A No. Generally speaking, anything involving your partner or other family members is not acceptable. You should still report this offer on iEthics for transparency and audit purposes.

Q Should I register on iEthics the sandwiches a supplier or tenant offers me during a meeting at their premises?

A No, you don't have to register modest hospitality of this kind, when it has a likely value of £15 or under, or local currency equivalent. You should however, always be mindful of the intention and timing of the offer, whether it might appear to place you under any obligation to an individual or organisation, compromise your impartiality or otherwise be improper.

For more information see our **Gifts and Hospitality policy**. **iEthics** can be found in the Oracle E-Business Suite, within 'Employee Self-Service'. For information on buying gifts for colleagues to mark special occasions or claiming expenses, see the **Business Travel and Expenses policy**.

Conflicts of interest and outside activities

A conflict of interest can happen when our personal, social, financial or political activities interfere – or appear to interfere – with our responsibility to Network Rail.

Everyone working for or on behalf of Network Rail has a duty to avoid conflicts of interest. We also need to think about how things might look, even if this isn't the case.

We should always make sure that outside activities do not interfere with our ability to fulfil our responsibilities, and do not use knowledge gained at Network Rail to benefit someone outside the organisation.

Being aware of the issues associated with conflicts of interest is particularly important if a partner or relation works in the rail industry, or for a supplier or customer. There may not be a problem, but it's important we're open, tell our manager and add an entry to iEthics if we have any relationship, either business or personal, that could create, or appear to create, a conflict of interest.

Share dealing

Whilst Network Rail is not a listed company, we frequently work with other organisations which are listed on the stock exchange. If these organisations were to win or lose a contract with us, it may affect their share price.

Employees are permitted to hold shares in organisations that do or want to do business with Network Rail. However, it's against the law to buy or sell shares (or encourage someone else to do so), based on unpublished, price-sensitive information that you have become aware of through your work at Network Rail.

Using the declaration of interests register on iEthics, you may need to declare that you or someone you have a close personal relationship with (such as a relative, partner, friend) hold shares in an organisation that does or wants to do business with Network Rail.



Q Your partner has recently begun working for a local supplier to Network Rail with which you have dealings, but because he/she left their previous job for health reasons, doesn't want this widely known. Is this OK?

A It is fine for your partner to work for the supplier, but you do need to tell someone in Network Rail, because people might think you have something to hide if you don't. Use iEthics to report it and talk to your manager.

Q You have been approached by a friend who is a local supplier to Network Rail to work with him for a few hours here and there. Should you do this?

A Probably not. Generally speaking, it's not acceptable to use knowledge or expertise you've gained as a result of working for Network Rail to help another business, particularly actual or potential suppliers, contractors or customers of the company.

A discussion with your manager is the best way of establishing how to deal with offers like this.

In all cases, it is very important that you get approval before you accept a position so that you are comfortable that there is no clash of interests. And if you are challenged, you'll be in a better position to respond.

For more information, see our **Conflicts of Interest and Outside Activities policy** and our **Guidance on Share Dealing**.

iEthics can be found in the Oracle E-Business Suite, within 'Employee Self-Service'.

Modern slavery

Modern slavery is the illegal exploitation of people for personal or commercial gain. Victims are controlled by force, threat, coercion and deception. It can take various forms including trafficking of people, forced labour, sexual or criminal exploitation or domestic servitude.

At Network Rail we're committed to doing business in a sustainable and responsible way. This includes a commitment to do all that we reasonably can to prevent all forms of modern slavery in any part of our business and our supply chains. We expect our customers and suppliers to do the same.

We respect the human rights of anyone working for us or on our behalf and we provide our employees with a safe working environment and fair terms of employment.

Everyone has a responsibility to speak out if they have concerns relating to human rights violations or acts of modern slavery. This includes raising concerns about those we do business with or those who do business on our behalf.

See our **Anti-Slavery and Human Trafficking policy** for more information.



Q How might I know if a colleague or a member of staff at one of our suppliers is a victim of modern slavery?

A There are a number of warning signs that may indicate someone is a victim of modern slavery. These may include:

- Workers showing signs of physical abuse and/or appear malnourished or unkempt
- Workers who seem to have few personal possessions or often wear the same clothes
- Workers who appear frightened or reluctant to talk to others
- Workers who are dropped off or collected for work by the same person regularly, either very early or very late at night
- Workers who don't have written contracts of employment
- Workers who have had to pay fees to obtain work

- Workers who aren't able to prove they're legally entitled to work in the UK
- A large number of people listed as living at the same address and/or providing the same bank details or emergency contact details
- Agencies charging suspiciously low rates against standard industry pricing.

If you're concerned about someone working for or on our behalf, you should speak out. See page nine of this Code for more information.

Using iEthics



iEthics is our online register for logging all gifts and hospitality – whether offered or received – and conflicts of interest.

Being open about hospitality and declaring actual or potential conflicts of interest can help prevent a situation seeming improper.

We should always make sure that submissions are clear, honest and are an accurate reflection of the gift or hospitality we are offered, or offering, or the conflict that we are facing.

iEthics can be found in the Oracle E-Business Suite, within 'Employee Self-Service'. If you don't have access to a computer, speak to your line manager or HR business partner who will be able to help you.

Sometimes, a declaration on iEthics won't be enough. You and your line manager might need to consider whether it's appropriate for you to accept a gift or hospitality, or whether alternative arrangements need to be made to manage a conflict of interest, whether actual or perceived.



An A-Z of how we work

It's important that we familiarise ourselves with Network Rail's approach to the following areas, so that we can deal confidently with any issues. More detail is available in the relevant policies.

Bullying and harassment

Harassment of anyone, particularly on the grounds of race, age, religion, colour, nationality, ethnic origin, disability, gender, sexual orientation, marriage or civil partnership, including any form of bullying – is completely unacceptable.

We won't tolerate it and we urge everyone in the business to report this type of behaviour, either through the line management structure, through HR or Speak Out (please note that Speak Out should not be used to report individual grievances). We know that it takes honesty and courage, but it's important.

For more information see our [Harassment policy and procedure](#).

Business travel and expenses

It's important that we think about how we deliver value for money every time we travel for business or claim expenses. So our Business Travel and Expenses policy applies to the majority of Network Rail staff, with the exception of maintenance colleagues on former IMC contracts who have separate contractual expenses arrangements.

In order to keep our travel expenses as low as possible, before we arrange a meeting, we should think about alternative methods in which the meeting could be conducted, including; telephone, teleconference or video conference, to avoid the need to travel to other locations.

For more information see our [Business Travel and Expenses policy](#).

Charitable giving

As one of the biggest organisations in the country, we are approached by all sorts of different charities and worthwhile causes, and you should pass on any such requests to the charitable giving team at CharitableGiving@networkrail.co.uk

There are lots of ways we support charities that are close to our hearts, such as payroll giving, fundraising and volunteering.

More information is available on [MyConnect](#); please visit our [Environment and Sustainable Development, Charitable Giving and Volunteering pages](#).

Community relations

We try hard to be a good neighbour by working with communities to minimise the effect of our work.

That means aiming to cut noise, reduce disturbance caused by deliveries to our sites and take care of issues like graffiti, trespassing or fly tipping on our property.

How well we do this directly affects our reputation. That's why we expect everyone in our business to be a courteous and helpful neighbour, as well as to comply with laws, regulations and company procedures.

Company records and information

Information is one of the most important assets we have. Good record keeping is a key part of our ability to operate effectively and retain our reputation for openness and honesty, especially now we're subject to the Freedom of Information Act.

We all need to make sensible, informed and timely decisions about the information we should keep and how long we need to keep it for, as well as what can be safely destroyed. If we get these decisions wrong it could cost Network Rail a significant amount in fines and penalties. It could also make it harder for us to find the information when we need it, which in turn impacts on our ability to do our job and provide a high level of service.

For a variety of reasons, the public, our delivery partners and the media may want us to release our information to them.

If you receive a request for information that isn't part of your day to day role, or if it's been requested under the Freedom of Information (FOI) Act, contact the FOI team immediately at foi@networkrail.co.uk

They're the experts and are here to help everyone in the business. If you're asked by the FOI team to provide information that's been requested, please respond as quickly and as helpfully as you can.

For more information see our [Freedom of Information or National Records Group MyConnect pages](#), our [Corporate Records Retention Schedule](#) or our [Quick Guide to Disposal of Records](#).

Delegation of authority

Delegation of authority is the assignment to individuals of responsibility and accountability for specific roles and tasks. Approval limits specify the value up to which an individual may authorise transactions, falling within the scope of their delegated authorities and job description.

It is extremely important that we all apply financial policy in a consistent manner, to prevent situations where mishandling of contracts and funds can arise.

For more information see our [Delegation of Authority policy](#).

Disposal of company property

How we dispose of our company property is just as important as how we look after it.

It's therefore essential we dispose of materials, property, plant and equipment, computer systems, trade secrets and confidential information in the right way and with the correct authority.

For more information see the [National Records Group MyConnect pages](#), the [Redundant Railway Assets Management policy](#) or contact the [Information Security team](#).

Our [Records Retention Schedule](#) confirms how long we need to retain information and records, and is supported by a [Network Rail standard on the Disposal of Records](#).

Diversity and inclusion

We want Network Rail to be an open, diverse and inclusive organisation.

This means that we expect all our people to treat each other, members of the public, our stakeholders and partners with respect. A respectful and open environment is comfortable with difference whatever it may be – a colleague's identity, their experience or expertise. We also want everyone who works with Network Rail to be able to give their best. This requires an inclusive supportive team working approach, being flexible and open. These ethics are supported by legislation and in particular the Equality Act 2010.

For more information see our [Equality, Diversity and Inclusion policy and framework](#).

Environmental and social responsibility

We're working hard to become a more responsible company. This means addressing the impact our work has on our workplaces, railway stations, passengers, the communities we operate in, our supply chain and the environment.

It's essential that we all play our part in meeting our environmental and social responsibility commitments and help our stakeholders to meet theirs.

For more information see our [Environment and Sustainable Development pages on MyConnect](#).

External communications

We rely on our good reputation to maintain the trust of government, customers and passengers.

We're committed to being open, transparent and sharing key information with them. That means we always think about what we say and choose the most appropriate channels to say it.

If any of us is contacted by the media or other external organisations, it's important we pass the contact on to our **Communications team** who can deal with it in the right way. This includes requests to speak at external conferences and seminars.

Health and wellbeing

A railway fit for the future needs a workforce fit for the future.

We believe that an active and healthy workforce is vital to achieving a safe, successful and sustainable organisation and we are therefore committed to the health and wellbeing of all our people.

We recognise that high levels of health and wellbeing within our people not only have the potential to improve their quality of life and ability to perform well in their roles, but also to support our long-term strategic aims.

People with high levels of wellbeing are safer, at work more often, more innovative and more engaged.

For more information see our Wellbeing Portal.

Information security

Network Rail relies upon its information and the systems that manage it to carry out its business operations. Protecting information supports the business in meeting its objectives and legal and regulatory obligations.

Information security supports Network Rail's business objectives by protecting the information it requires to achieve these. Through consistent identification, understanding and assessment of information security risks, Network Rail is able to apply appropriate controls in order to manage information security risks at the appropriate level for the company.

For more information see our Information Security Standards.

Information technology

Our electronic data and information – and the technology that stores and processes it – are a vital part of our business.

Today, information technology is all around us – smartphones, tablets, laptops, desktop computers and the systems and services they consume – and it is important we always use information technology resources in the right way and for the right purposes.

For more information see our Information Security Standards.

Managing our relationships with external stakeholders

As the owner and operator of Britain's railway network we deal with a wide range of stakeholders including individuals (for example passengers or lineside neighbours), customers (and owning groups), freight end users, national funders, local funding bodies, investors, passenger representative bodies, companies that form part of our supply chain, regulatory authorities and local government agencies and authorities.

At Network Rail we value our stakeholders and aim to develop long-term working relationships that are built on openness, fairness and trust. In all of our dealings with stakeholders we act ethically and within the law.

Our **Stakeholder Relations Code of Practice** sets out high level principles that we are committed to following when dealing with our stakeholders.

Managing public money

We've always considered value for money in how we do business, but following our reclassification we need to think about value for money for the public purse as a whole. This is one of the principles underpinning the Government's guidelines for Managing Public Money. So we must consider value for money in all that we do.

This includes making sure we only pay commissions, consultants' fees and retainers that are directly related to the services a third party has carried out for us. We must never make payments, loans or offer commissions that are unrelated or disproportionate to the work we've received.

For more information contact
ReclassificationGroupFinance@
networkrail.co.uk

Personal information and data protection

In the course of running the company, we collect and use personal information about our employees (whether current, past or prospective), tenants, lineside neighbours, authorised level crossing users, members of the public, contractors and suppliers.

In doing this, we're required to comply with relevant data protection law, including the new General Data Protection Regulation (GDPR), which came into effect in May 2018.

The GDPR provides greater safeguarding for personal information and has brought data protection up-to-date with advancements in technology.

Breaches can cause damage and distress to the individual(s) concerned and could result in large fines and damage to our reputation.

Personal information should always be handled with care. If we use common sense rules around how we handle personal information, it's less likely to be damaged, disclosed to unauthorised people or lost.

For more information see our
Data Protection policy, training and
other resources on MyConnect.

Personal relationships at work

We proudly recognise that the rail industry is a large network with a heritage of employing generations of railway employees. However, to maintain our reputation as an open and honest organisation, it is essential that all recruitment decisions are based on merit and in line with this Code and any other relevant policies. It's important that we create an environment that avoids favouritism, unprofessional behaviour and reduces the potential for conflicts of interest to arise.

We should all be mindful of our personal relationships at work and whether they do, or could be perceived to cause a conflict of interest in situations such as recruitment or managerial responsibilities.

A personal relationship could be a spouse, partner, child, mother, father, sister, brother, grandparent, aunt, uncle, cousin or an individual whose relationship with the employee is similar to that of persons related by blood or marriage. This may also include friends.

For more information see our
Working with Relatives/Personal
Relationships at Work policy.

Social media

Social media, such as Facebook and Twitter, are increasingly used to communicate, discuss and disseminate information, and we have a team whose job it is to manage and use them on behalf of Network Rail. It's important no-one else does so unless they've been trained and have the right approval.

The lines between your personal life and your work life can become blurred when using social media. When using social media in a personal capacity, always ensure that it is clear that your comments are your own and not those of Network Rail and never bring the company into disrepute.

For more information see our [Social Media policy](#).

Suppliers and contractors

Our suppliers and contractors play a crucial role in helping us maintain, operate and enhance the rail network and service our customers. We have to choose them carefully, compliant with legislation and our reclassified status. We also expect them to act in accordance with this Code.

When we're selecting contractors or suppliers we need to be clear that:

- All contractors and suppliers are chosen solely on merit
- Any hospitality we receive must be consistent with our policy on gifts and corporate hospitality
- We don't pass on any confidential information about another contractor or supplier, for example pricing or bid information.

If any of us becomes aware of a supplier who either isn't being treated in line with these guidelines or are themselves breaking the rules, then it's essential we either report it to our line manager or use Speak Out.



If you want more information...

If you have any questions about this Code, the policies which support it, or if you would like further advice, please contact ethics@networkrail.co.uk, visit our **MyConnect** page or our webpages on www.networkrail.co.uk

Our business integrity department investigates suspected breaches of this Code. You can contact them at businessintegrity@networkrail.co.uk or 1 Eversholt Street, London, NW1 2DN.

Ethics training is mandatory for all Network Rail employees. For more information visit our ethics page on **MyConnect** or contact the ethics team at ethics@networkrail.co.uk

To find out more about the Code of Business Ethics
get in contact with the ethics team at
ethics@networkrail.co.uk