

# Business Performance Policy

TRL is a knowledge-based organisation. We help decision makers create global transport systems that are safe, clean, affordable, liveable and efficient. We will, through the way we work, behave, and via the independent, impartial research we conduct, show that we are committed to:

- Ensure our people are at the heart of our business. (See 1.1)
- Build sustainable relationships based on honesty, partnership, and fairness. (See 1.2)
- Recognise and manage the risk of our work activities while maintaining business performance. (See 1.3)
- Protect information assets under our control against deliberate or unintentional corruption, loss or deletion, and prevent unauthorised access. (See 1.4)
- Ensure we have accurately identified and fulfilled our legal and other obligations.

Everyone who works for us is responsible for working in a way that supports this. We will challenge behaviour that falls short of expectations, identify issues and report them without fear of reprisal.

The Business Management System (BMS) helps us to satisfy the applicable requirements. The BMS consists of this Policy Statement and all the associated processes which support the way we conduct our business.

The BMS applies to TRL Ltd and any subsidiary companies, to all our people globally, and all those acting on TRL's behalf. We expect our business partners, suppliers, subcontractors and associates to apply the same standards as our employees

## 1.1 Our People

Our people are the heart of our business, they are our greatest asset and our competitive advantage. We recruit and retain staff from the widest possible talent pools. We work to be recognised as a diverse and inclusive working environment in which all staff feel valued and respected, where opportunities are accessible to all, and where flexibility in our working and employment practices is embraced.

We will

- Seek to recruit a representative workforce and operate inclusively.
- Ensure everyone we interact with (colleagues, participants, customers or partners) of whatever nationality, colour, race or religious belief are treated with respect and without sexual, physical or mental harassment.
- Offer our employees clear and fair terms of employment and provide resources to enable their continuous development.
- Operate a benefits and rewards package that includes flexible hours and flexible leave packages plus paid leave for charitable activities or members of the UK reserve forces.
- Maintain Investors In People (IIP) accreditation as evidence of our continual commitment to our people.
- Maintain forums for employee consultation and business involvement such as the Employee Council and the HSE Champions.
- Support and encourage our employees to help their chosen charities. We commit to matching each pound raised by staff for our chosen charities with an equivalent contribution from the business.

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## 1.2 How we do business

We will

- Be open and transparent in our business practices. We will conduct our business fairly, honestly and to the highest of standards.
- Refrain from dishonest and immoral competition.
- Listen to the feedback of our customers and other stakeholders.
- Conduct our business relationships with integrity and courtesy, and honour our trading commitments.
- Set out agreed terms, conditions and the basis of our relationship in our contracts and operate in a way which safeguards against unfair business practices.

### ***Bribery***

Bribery is offering, promising, or otherwise transferring anything of value (directly or indirectly) to or from any person, to persuade or influence that person to perform their role improperly. We do not give or receive bribes or engage in corrupt practices such as bribery, collusion, extortion, and fraud or other improper rewards aimed at unfair competitive advantage. We will work in a way that aims to prevent bribery by any person associated with our company. Any demand for or offer of a bribe must be rejected immediately and reported to the Head of Compliance.

We do not differentiate between a facilitation payment and a bribe, both are illegal under UK legislation, even where payment may conform to what is considered acceptable under local law.

We maintain a register of gifts and hospitality given or received. All staff will record gifts received or given that exceed £75 in value to ensure we remain transparent in our business activities.

### ***Fraud, deception, dishonesty and false claims***

Anyone working on behalf of TRL will not defraud, deceive or act dishonestly, and will protect the company against fraud. We will not make inaccurate expense claims (whether to benefit projects or individuals) for something which we are not entitled to. We will never knowingly misrepresent the time spent or services /materials provided. We will not conceal defects or fabricate evidence. We employ controls such as countersignature of expense claims and independent review to monitor expense claims alongside our research ethics and technical review of project outputs.

TRL does not permit the establishment or maintenance of any undisclosed or unrecorded account, fund, asset or activity, and expect that staff will ensure that proper and full records are made of all transactions on behalf of the company.

### ***Human Rights***

Respect for human rights is fundamental to our activities. We operate ethical and lawful employment practices and identify and prevent adverse human rights impacts. We will ensure that anyone we deal with is treated with dignity and respect. We are committed to ensuring that human trafficking and slavery does not exist within our own business or our supply chain. All employees are made aware of modern slavery and are expected to report any concerns that they might have. Our Modern Slavery Statement is published annually on our website.

### ***Safeguarding and Ethical Conduct***

In addition to respecting human rights, we have a strict ethics process concerning our research activities. All research projects which involve the participation of human subjects are subject to a risk-based ethical review.

We do not tolerate any bullying, harassment, sexual exploitation or abuse either within our activities or those of our supply chain. We do not routinely engage with children or vulnerable adults however on the occasions we do, we recognise the need to treat such individuals with additional care. Specific assessments of circumstances, risks and the appropriateness of controls will be undertaken via Ethics Review.

## ***Whistle Blowing***

All employees are required to report, promptly, any violations of this or other policies that come to their attention. We will co-operate fully and openly in any audit, enquiry, review or investigation carried out internally or externally. We have a process in place to allow Whistle Blowing which operates alongside, but independently of our Complaints and Grievances process. Both these processes enable reports to be made in confidence and without fear of reprisal.

## ***Conflict of Interest***

All employees, contractors, associates and other business partners need to be aware of and highlight anything that might lead to or be interpreted as, a conflict of interest between their activities and the business of TRL or its customers. We monitor and track the research activities we complete to ensure, as far as is practical, that our activities do not create a conflict of interest. In some circumstances, conflicts of interest may arise. If this happens specific controls will be put in place, relevant Customers will be notified, and control measures will be agreed with them in advance of any work activities being completed.

## **1.3 Risk Management**

We will

- Provide safe and healthy working conditions to prevent work-related injury and/or ill health by identifying and eliminating hazards.
- Consider the ethical implications of activities before they start. We will ensure that where research may involve human participation it is subjected to formal ethical review.
- Seek to increasingly operate sustainably to protect the environment and prevent pollution. We will contribute to sustainable communities built around resilient, intelligent infrastructure.
- Provide and maintain a clean, healthy and safe working environment. We will regularly review our activities to identify how we can improve processes.
- Encourage staff to identify and consider the potential environmental impacts of their business travel and to mitigate these impacts.
- Educate and support staff to ensure their mental wellbeing is not compromised by their work activities.

Some risks will always exist. Risk management is an integral part of all our processes and decision-making activities.

## **1.4 Data & Information**

We will:

- implement controls to preserve the confidentiality, integrity, and availability of our information assets IA.
- Collect, store and process personal information relating to employees, customers, stakeholders and other interested parties with appropriate levels of confidentiality. We will gather, store and

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handle personal data fairly, transparently, appropriately, with respect towards individual rights and in line with relevant regulations.

## ***Information Assets***

We collect and use information about people, places and things to conduct our research. Some of it is commercially sensitive, some of it pertains to legal cases, some of it is related to specific ideas and intellectual property which is valuable (to us or our customers), some of it belongs to people (personal data). These sources of information are known as information assets. All our information assets are important and need to be protected. We will:

- Ensure all information assets under our control are protected against unauthorised access, deliberate or unintentional corruption, loss or deletion and as far as possible ensure the same when others are managing or maintain them on our behalf.
- Ensure that business processes, systems, and applications, are protected by controls which preserve their confidentiality, integrity, and availability.
- Actively identify and assess risks to identify controls that reduce those risks to an acceptable level.
- Protect the confidentiality of information.
- Make sure that any third party who has access to information assets under the control of TRL has appropriate information security controls in place.
- Ensure actual or suspected information security breaches are identified, analysed and investigated.

## ***Personal Data***

We need to collect and use a variety of information (data) about people to operate our business, we may also be required by law to collect and use data. The people we collect data from includes members of the public, current, past and prospective employees, customers, and suppliers. Personal data will be handled and dealt with under relevant legislation, codes and guidance however it is collected, recorded and used regardless of whether it is on paper, in computer records or recorded by other means. We are registered with the Information Commissioner as a Data Controller; our registration number is Z6918343. Our general privacy notice is held on our website and is updated regularly

## ***Clear Desks***

All employees are responsible for ensuring:

- Information marked as protect or confidential is secured.
- There is no unauthorised use of any computer account assigned to or controlled by them. Employees are responsible for any actions carried out from their accounts. Computers should be screen locked when they are unattended. Computers should be completely shut down at the end of the workday. Passwords should not be written down in an accessible location.
- Filing cabinets are closed and locked when not in use or when not attended.
- Keys used for access to personal or sensitive information are secured.
- Wastepaper which contains sensitive or confidential information is securely disposed of.
- Whiteboards containing personal or sensitive information are erased after use.

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### **1.5 Unplanned or Undesired Outcomes**

Everyone working for us, or on our behalf, is responsible for reporting actual, potential or suspected unplanned and/ or undesired occurrences as soon as possible.

We will:

- Reporting of all incidents whether they are actual, suspected, threatened or potential.
- Investigate incidents at a level of detail proportionate to the potential outcome of the incident.
- Record and maintain evidence in a form that will withstand internal and external scrutiny.
- Inform external bodies or data subjects as appropriate.
- Take action to prevent further damage, identify improvements and to prevent recurrence where possible.

### ***Business Continuity***

We have a business continuity plan that covers terrorist attack, major fire, major power failure, major flood, damage to external connectivity, adverse weather, wilful damage, pandemic, theft, or major accident.

### **1.6 The people and businesses we work with**

We want to consistently deliver in line with our customers' expectations. We work with other businesses to supplement our services, to provide us with support, materials, and goods and to help us with the delivery of our activities wherever necessary. Businesses we work with must operate at standards that are equal to our own. We ask them to demonstrate that they provide safe working conditions, treat workers with dignity and respect, act ethically and act within the relevant laws, regulations, and codes. We ask suppliers to complete an assessment of their standards and agree to our Supplier Standards of Conduct in line. All procurement is undertaken in line with our procurement processes.

### **1.7 Compliance**

We are committed to ensuring that we have accurately identified and fulfilled our compliance obligations, including legal and other applicable requirements. We will

- Monitor all relevant legislation.
- Where no legislation exists, adopt industry best practice or develop and implement our own appropriate standards.
- Demonstrate adherence to International standards. We maintain certification to ISO 9001, ISO 14001, ISO 45001, ISO 27001 and ISO 17025. We also choose to adopt principles established in standards such as BS 22301 (Business Continuity), ISO 44001 (Collaborative Relationships) and BS 10500 (Anti-Bribery).

Compliance with these statements and all other applicable processes and procedures will be monitored.

### ***Awareness***

We will ensure that our employees, contractors, associates, and customers are made aware of our business principles and this policy statement. Employees will receive guidance and supervision on behaviour relevant to their role, and their knowledge and understanding will be regularly assessed. Failure to comply with this policy could result in disciplinary action.

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## 1.8 Outcomes

Successful implementation of this Policy will ensure that:

- Significant risks will be identified, mitigated and monitored. This will support our ability to deliver quality products and services to meet our customers' expectations.

This policy has immediate effect and replaces all previous versions. It will be reviewed annually and amended as necessary following any meaningful change or review by TRL's Executive Leadership team. The policy will be communicated within TRL and made available to interested parties.

A handwritten signature in black ink, appearing to read 'Paul Campion'.

Paul Campion  
CEO  
*September 2022*