

Corporate Social and Ethical Trading Responsibility

The Just Recruitment Group is committed to being an ethical, inclusive, fair and environmentally conscious business by understanding and working to our Corporate Social and Ethical Trading Responsibility.

Environmental awareness

We believe in valuing our environment and are constantly striving towards a better way of doing business. We are aware of the environment and we strive to make our business more environmentally friendly wherever we can. We revisit our Environmental Policy regularly and are always open to new ideas that could improve our existing practices. This includes evaluating our internal processes, maximizing re-cycling, minimizing our energy use and ensuring we select and manage our suppliers effectively.

Energy usage

We promote the efficient use of energy, evaluating our energy usage in the office and where possible, purchasing low energy IT and office equipment.

Waste generation

In order to reduce waste generation, we encourage recycling and environmentally conscious waste disposal (paper, toners), donating any recycling proceeds to charity.

Sustainable procurement and the use of suppliers

It is just as important for us to ensure that our suppliers are compliant to environmental standards where necessary, and have appropriate social and ethical practices. Where possible, we purchase recycled and Fair Trade products.

Charity awareness

We have a Charity of the Year pledge, where we encourage employees each year to nominate a charity in order to spread our help across a wide range of causes over the long term. Since 2016, the nominated charity is EACH, and through sponsored tandem skydives and Colour Dashes, the Just Recruitment Group has given over £12,000.

Employment awareness

We aim to recruit high caliber candidates for our clients and work hard to attract and source candidates based on their skills, knowledge and ability to carry out the role to the highest standard. We are committed to the values of diversity and encourage applications from candidates irrespective of age, disability, ethnicity, gender, religion and sexuality.

The Just Recruitment Group is an equal opportunities employer and everyone is afforded an equal opportunity to develop and improve within the company structure, which gives each employee the opportunity for promotion into new roles, new responsibilities and continuously enhancing their skills base.

Central to the way we operate our business is our employees' wellbeing, ensuring we provide them with a safe and healthy environment and respect the need for a work-life balance. Our employees' and candidate's opinions are valued and we actively encourage all ideas though various suggestion scheme and awards.

Just Recruitment Group believes strongly in ethical principles and good stewardship and are therefore proud to guarantee that we trade according to the following criteria:

- 1. All employment is freely chosen
- 2. Working conditions are safe and hygienic
- 3. Child labour is not used
- 4. Wages are fair and comparable to industry standard
- 5. Wages are paid on or above the minimum wage
- 6. Deductions from wages as a disciplinary measure shall not be permitted
- 7. Working hours are not excessive
- 8. No discrimination is practised
- 9. Regular employment is provided for those who are employed on a permanent contract
- 10. No harsh, cruel or degrading treatment or practices are allowed
- 11. No bribery, corruption, blackmailing or bullying is permitted
- 12. Third Party Suppliers and buyers are both free to sell and buy from any number of other businesses.

We would expect all our suppliers to affirm that their businesses are also built on these ethical criteria.

We have developed a full Ethical Trade policy statement outlining how we expect our practice to develop in order to be able to offer strong guarantees to our customers that the services they receive from us have been ethically designed, managed and implemented.

OUR FULL ETHICAL TRADE POLICY STATEMENT

1. Policy Statement

The Just Recruitment Group Ltd recognises that our commercial activities have potential to impact on our suppliers and our locality. As a socially responsible small business our suppliers, local community and customers have a right to expect:

- All Employee's and Agency Workers involved in the delivery of services provided by the Just Recruitment Group are treated with full consideration to their basic human rights.
- The Just Recruitment Group acts in an ethical manner above and beyond basic legal requirements.
- The Just Recruitment Group is therefore committed to implementing the principles of the Ethical Trading Initiative Base Code (although we are not members of the ETI).
- This policy sets out the Just Recruitment Group's commitment to its suppliers, clients and candidates, setting out the measures we are taking to ensure that we are acting in an ethical manner.

2. The Just Recruitment Group's Commitment to its suppliers, service providers and customers:

The Just Recruitment Group recognises that our ethical and social performance and reputation is a part of our overall commercial success.

Employees and Agency Workers

- The Just Recruitment Group is committed to ensuring that our employment practices and the enforcement of corporate regulations ensure the protection of the rights of all those who work for us. In many areas we aim to operate above the minimum standards required by law to ensure our employees are safe, rewarded and valued. As we expand we will be able to offer more opportunities for our staff.
- No forced, bonded or involuntary labour shall be used.
- All employment and temporary work with the Just Recruitment Group is freely chosen.
- Employees and Agency Workers are free to leave the Just Recruitment Group after reasonable notice.

Clients

The Just Recruitment Group is committed to demonstrating its ethical and social responsibility credentials to enable Clients to make informed choices about whose services they purchase.

Suppliers

The Just Recruitment Group is committed to monitoring social standards in our supply chain, and we encourage our suppliers to operate to the same ethical standards we employ ourselves.

3. The Just Recruitment Group's Ethical Trading Code of Practice applies to:

- Staff directly employed by the Just Recruitment Group on temporary or permanent contracts.
- Agency Workers provided to undertake work for or on behalf of the Just Recruitment Group.

4. Working conditions are safe and hygienic.

- The Just Recruitment Group takes adequate measures to prevent accidents and minimize potential hazards.
- Employees receive regular health & safety training.
- Agency Workers are given client specific health & safety training
- Staff and Agency Workers have unrestricted access to toilet facilities and drinking water.
- The Just Recruitment Group has a published Health & Safety Policy.

5. Working hours and remuneration are reasonable and comparable to other companies in our sector and regular employment is provided.

- Staff and Agency Workers pay rates are on or above the national legal minimum standards.
- Staff and Agency Workers are not forced to work in excess of 40 hours per week.
- Staff and Agency Workers are given written terms and conditions of employment or engagement that includes details the rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of employment.
- No deductions are made from wages as a disciplinary measure, and pay slips used as a means to comply with obligations under labour or social security laws.

6. No discrimination is practised:

- There is no discrimination in pay, hiring, compensation, access to training, and promotion.
- Termination of employment, engagement or retirement on the grounds of race, nationality, religion, age, disability, marital status, sexual orientation, union membership or political affiliation.
- Opportunities for personal and career development are equally available to all Employees and Agency Workers.
- **7. No harassment,** threats, abuse or intimidation shall be practised. Physical, verbal and sexual threats, abuse, harassment or intimidation is expressly prohibited and grounds for summary dismissal, if proved.

8. Confidentiality and Data Protection

- All information relating to Employees and Agency Workers is confidential and subject to the GDPR and Data Protection Laws and in relation to an Agency Worker is provided solely for the purpose of providing work-finding services to the Hirer. Such information must not be used for any other purpose nor divulged to any third party and the Hirer undertakes to abide by the provisions of the GDPR in receiving and processing the data at all times.
- The Just Recruitment Group undertakes to keep confidential all Relevant Terms and Conditions that the Hirer discloses to us and not to use such information except for the purposes of compliance with the Agency Workers Regulations (including, for the avoidance of doubt and without limitation, when dealing with any request for information or complaint made by any Agency Worker or any AWR Claim).
- Information relating to the Just Recruitment Group's business which is capable of being confidential must be kept confidential and not divulged to any third party, except information which is in the public domain.

9. Intellectual Property Rights

• All copyright, trademarks, patents and other intellectual property rights deriving from the Assignment shall belong to the Hirer. Accordingly the Just Recruitment Group shall use its reasonable endeavours to ensure that the Employee and/or Agency Worker shall execute all such documents and do all such acts in order to give effect to the Hirer's rights pursuant to this clause.

10. Freedom Of Association And The Right To Collective Bargaining Are Respected

- Employees and Agency Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The Just Recruitment Group adopts an open attitude towards the activities of trade unions and their organisational activities.
- Employees and Agency Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under law, the Just Recruitment Group facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

11. Organisation

The Just Recruitment Group Directors have overall responsibility for all aspects of ethical trading at work within the business.

12. Looking forwards towards further improvement, the Just Recruitment Group are keen to learn from others and would ask if anyone has any ideas or feedback regarding our policy or practice to write to us at Head Office, Tavern House, Station Road, Ardleigh, Essex, CO7 7RS

Whistle Blowing on Bribery, Fraud and other Corrupt Behaviour Policy

Whistle Blowing

The Public Interest Disclosure Act 1998 protects workers who blow the whistle about wrongdoing. All Employees are expected to maintain the highest standards of integrity and good faith. This Policy is intended to provide you with guidance as to the circumstances under which such protection is available and the steps to be taken should you feel that a matter of public interest is at stake.

Although disclosure may be made to certain public authorities, the conditions under which this may be done in order for the employee to be protected are limited. The Just Recruitment Group's policy is therefore that disclosures should be made in the first instance to the Directors of the Company.

The Nature Of The Disclosure

Only certain kinds of disclosure qualify for protection and are therefore termed "qualifying disclosures". They are disclosures which, in the reasonable belief of the worker making the disclosure, tend to show one or more of the following:

- a criminal offence
- the breach of a legal obligation
- a miscarriage of justice
- fraud
- danger to the health and safety of any individual
- damage to the environment, or
- that information of the type set out above has been or is likely to be deliberately concealed.

If you become aware of any information of this nature which causes you concern, you should bring the matter to the attention of a Director.

The Company will ensure that any disclosure made is kept as confidential as possible; however, you should be aware that it may be necessary to divulge such information during the course of any investigation.

If an investigation into the allegations is thought necessary, you will be informed that the allegations will be put to the person accused of wrongdoing. You will be informed of the progress and outcome of any investigation into the allegations.

If you are unhappy with the way in which your disclosure is received or dealt with, you should immediately raise that concern with senior management, and if necessary at the highest level within the Just Recruitment Group.

The Company is committed to ensuring that no employee is subjected to any detriment, or victimised, by reason of having made a protected disclosure in good faith, and will do everything within its power to investigate the matter fully and take the appropriate action against any wrongdoer. You should also be aware that provided certain conditions are met, the law against suffering any detriment protects you.

However, if you make a disclosure which you do not believe or which is made maliciously or with some ulterior motive (such as a grudge against a fellow employee), this may be treated as a disciplinary matter to be dealt with under the disciplinary procedure.

Receipt of Gifts

Your working relationships may bring you into contact with outside organisations where it is normal business practice or social convention to offer hospitality, and sometimes gifts. Offers of this kind to you or your family can place you in a difficult position. Therefore no employee or any member of his or her immediate family should accept from a supplier, customer or other person doing business with the Company, payments of money under any circumstances, or special considerations, such as discounts or gifts of materials, equipment, services, facilities or anything else of value unless:

- They are in each instance of a very minor nature usually associated with accepted business practice.
- They do not improperly interfere with your independence of judgement or action in the performance of your employment.

In every circumstance where a gift is offered, the advice of a Company Director must be sought.

Bribery, fraud and other Corrupt Behaviour

The Company follows a strict anti-bribery, fraud and corruption procedure in line with the Bribery Act (2010).

A bribe is defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

Fraud is a type of criminal activity, defined as:

'abuse of position, or false representation, or prejudicing someone's rights for personal gain'.

The general criminal offence of fraud can include:

- deception whereby someone knowingly makes false representation
- or they fail to disclose information
- or they abuse a position.

If you bribe (or attempt to bribe) another person, or behave fraudulently, intending either to obtain or retain business for the company, or to obtain or retain an advantage in the conduct of the company's business this will be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe or behave fraudulently will be considered gross misconduct. In these circumstances you will be subject to formal investigation under the Company's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.