

ETHICS AND BUSINESS INTEGRITY POLICY

Policy Statement

24-7 Staffing Limited is committed to the practice of responsible corporate behaviour. Through our business practices we seek to protect and promote the human rights and basic freedoms of all employees and agents. Further we are committed to protecting the rights of all of those whose work contributes to the success of the Company, including those employees and agents of suppliers to the Company. This policy is non-exhaustive, and all aspects of the Company's business should be considered in the spirit of this policy.

Human Rights & Modern Slavery

- 24-7 Staffing Ltd is not required to publish a Modern Slavery Statement as we fall outside the criteria, however, the Company upholds the principles of the Modern Slavery Act 2015 and is committed to operating responsibly and establishing high ethical standards across our company.
- 24-7 Staffing is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
- 24-7 Staffing is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses; cruel, inhuman or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion.
- 24-7 Staffing uphold the principles of the "Stronger Together" movement which promotes responsible recruitment, offering fair work, free of exploitation.
- 24-7 Staffing will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its employees or who breaches the human rights of those affected by the organisation's activities.
- We will not tolerate modern forms of slavery or human trafficking in our business, including our supply chain. We expect businesses, companies, and other entities that provide, or seek to provide, any kind of goods or service to 24-7 Staffing to respect human rights and promote similar principles in their own supply chains.
- All our staff receive training and support that is appropriate to their role. Operational staff undertake specific recruitment process training that includes checking Right to Work in the UK, discrimination in recruitment and modern slavery.
- Additional training is given to appropriate operational staff who organise workers protected by the Gangmaster Licencing Regulations.
- Processes are in place to identify signs of modern slavery for all work seekers registering for work with 24-7 Staffing.
- Reports surrounding these issues are taken extremely seriously by our senior leadership team, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
 - Working with the appropriate organisations to improve standards,
 - Removing that organisation from our preferred supplier list,
 - Passing details to appropriate law enforcement bodies.

Employees' Rights

- 24-7 Staffing Ltd is committed to complying with all relevant employment legislation and

regulations. We regard such regulations and legislation as the minimum rather than the recommended standard.

- No employee will be discriminated against on the basis of any Protected Characteristic as identified in the Equality Act 2010. All employees must be treated equally. Employees with the same experience and qualifications should receive equal pay for equal work.
- No employee should be prevented from joining or forming a staff association or trade union, nor should any employee suffer any detriment as a result of joining, or failing to join, any such organisation.
- Employees should be made aware of the terms and conditions of their employment or engagement from the outset. In particular employees must be made aware of the wage that they receive, when and how it is to be paid, the hours that they must work and any legal limit which exists for their protection and any overtime provisions. Employees must also be allowed such annual leave, sick leave, maternity / paternity leave and such other leave as is granted by legislation as a minimum.
- The Company does not accept any corporal punishment or any form of harassment, or bullying.

Environmental Issues

- 24-7 Staffing Ltd is committed to keeping the environmental impact of its activities to a minimum and has established an Environmental Policy in order help achieve this aim. Copies of the Environmental Policy are available on request.
- As an absolute minimum, the Company will ensure that it meets all applicable environmental laws in whichever jurisdiction it may be operating.

Conflicts of Interest & Anti-Corruption

- 24-7 Staffing Ltd holds the trust and confidence of those with whom it deals, including clients, suppliers and employees as fundamental to its success. Conflicts of interest potentially undermine the relationship of the Company with its partners. In order to help preserve and strengthen these relationships, the Company has developed rules and guidelines concerning the conduct of its officers and employees aimed at minimising the possibility of conflicts of interest. Employees may not accept corporate hospitality or gifts which could be considered an incentive, enticement or conflict of interest in any way, shape or form. In the instance of any uncertainty, receipt of such gifts or hospitality must be approved by The Managing Director prior to being accepted.
- The company will operate in accordance with the policies, procedures and restrictions of its clients in relation to corporate hospitality, gifts and incentives at all times.
- The company will not offer inducements, commissions or rewards of any kind to clients or individuals acting on behalf of clients; nor will it show particular favour or disfavour to any person in relation to the contract or delivery of the services.
- Employees and anyone working on behalf of the company must disclose any anticipated conflict of interest which may have the potential to interfere with the person's loyalty and objectivity while carrying out their job.
- Employees are expected to adhere to the rules and procedures set out in the Anti-Criminal Finance Policy.
- All officers, employees and representatives of the Company are expected to act honestly and within the law (including the Prevention of Corruption Acts 1889-1916 and the Bribery Act 2010).

Information and Confidentiality

Information received by employees, contractors or agents of 24-7 Staffing Ltd will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given. The Company will at all times ensure that it complies with all applicable requirements of data protection legislation in force from time to time.

Suppliers and Partners

- 24-7 Staffing Ltd expects all suppliers and partners to work towards and uphold similar ethical and moral standards.
- We will investigate the ethical record of potential new suppliers before entering into any agreement. Further, the Company reserve the right to request information from suppliers regarding the production and sources of goods / services supplied.
- The Company reserve the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this Ethics and Business Integrity Policy.

Ethical Purchasing & Procurement

24-7 Staffing Ltd is committed to procuring its works, goods and services in an ethically and environmentally sensitive way, yet with proper regard to its commercial obligations, ensuring that suppliers deliver to agreed timescales, quality and cost.

Purchasing is undertaken in a manner that encourages competition and offers fair and objective evaluation of offers from all potential suppliers.

Purchase of goods and services with an annual value in excess of £10,000 excluding VAT will be conducted according to the following principles:

- Completion of a business case to evidence the need to purchase.
- Procurement practices will be transparent, auditable and fair.
- Research will be conducted to ensure a clear understanding of the risks associated with the purchase of goods and services, purchasing decisions will include contingency and risk mitigation strategies.
- Tendering is based on both quality and cost, is evaluated in a fair, objective, and structured manner that actively encourages competition.
- Small and local organisations will be encouraged to participate in the procurement process.
- Company employees responsible for purchasing will not accept corporate gifts, or any type of solicitation that could be construed as enticement.
- The procurement process demonstrates that the approach taken to competition is rigorous, balanced and driven by service needs and market intelligence.
- Potential suppliers are ethical, sensitive to the environment and operate within UK legislation.
- Suppliers are able to demonstrate their ability to deliver continuous improvement and cost savings throughout the life of the contract.
- Business transactions will, where possible be conducted electronically.

Review

This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.