

HR Smith Group of Companies Ethics Policy

1. Purpose

- 1.1 HR Smith Group of Companies (“the Company”) is committed to the practice of responsible corporate behaviour.
- 1.2 Through its business practices, the Company seeks to protect the human rights and basic freedoms of all its employees, agents and suppliers, as defined by English law.
- 1.3 The Company is also committed to eliminating bribery and corruption, as defined in our anti-bribery policy

2. Who this Policy applies to

- 2.1 This Policy applies to all persons working for us or any group company, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, individual temporary or fixed term contractors and all other suppliers of goods or services to the Company, wherever located.
- 2.2 This Code does not form part of any contract of employment or contract to provide services and we may amend it at any time.

3. Human Rights

- 3.1 The Company is opposed to the use of modern slavery and human trafficking in all forms; cruel, inhuman or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion.
- 3.2 The Company will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social and Cultural Rights and the Human Rights Act 1998 and English law.
- 3.3 The Company will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers.

4. Workers’ Rights

- 4.1 The Company is committed to complying with all relevant employment legislation and regulations, as defined by English law.
- 4.2 No worker should be discriminated against on the basis of age, gender, race, sexual orientation, religion or beliefs, gender reassignment, marital status or pregnancy. Workers with the same experience and qualifications should receive equal pay for equal work.
- 4.3 No worker should be prevented from joining or forming a staff association or trade union, nor should any worker suffer any detriment as a result of joining, or failing to join, any such organisation.
- 4.4 The Company does not accept any harassment, bullying or workplace violence in any form.

5. Environmental Issues

- 5.1 The Company 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.

6. Conflicts of Interest

- 6.1 The Company holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers and employees. Conflicts of interest potentially undermine the relationship of the Company with its partners.
- 6.2 In order to help manage conflicts of interest the Company has developed a Corporate Hospitality and Gifts Policy, which provide rules and guidelines concerning the conduct of its officers and employees.
- 6.3 All officers, employees and representatives of the Company are expected to act honestly and within the law.

7. Information and Confidentiality

- 7.1 Information received by employees, contractors or agents of the Company will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given.
- 7.2 The Company will process any personal data collected in accordance with its Data Protection Policy.

8. Suppliers and Partners

- 8.1 The Company expects all suppliers and partners to work towards and uphold similar ethical and moral standards.
- 8.2 The Company reserves the right to request information from suppliers regarding the production and sources of goods supplied.
- 8.3 The Company reserves 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 Policy.

9. Bribery and Corruption

- 9.1 The Company has developed an Anti-Bribery Policy, which provide rules and guidelines concerning the conduct of its officers and employees aimed at avoiding risks associated with bribery and corruption. Copies of the Anti-Bribery Policy is available from policy@hr-smith.com.
- 9.2 All officers, employees and representatives of the Company are expected to act honestly and within the law.

10. Responsibility and contact

- 10.1 The board of directors are responsible for implementing this Policy.
- 10.2 If you are aware of any breach of this policy you must notify your manager or contact policy@hr-smith.com as soon as possible.

This policy has been approved & authorised by:

Name: Richard Smith

Position: Managing Director

Date: []

Signature:

