

One of The Wise Recruitment Group's (The Company) core values is to uphold responsible and fair business practice. It is committed to promoting and maintaining the highest level of ethical standards in relation to its business activities. The Company is therefore committed to acting transparently, fairly and with integrity in all of its business dealings and relationships and we will implement and enforce effective systems to implement and monitor this policy.

Responsibility

The Company's reputation for ensuring its business is conducted according to ethical, professional and legal standards is of paramount importance and the Company expects all persons acting on its behalf to uphold the commitment to acting transparently and fairly in every aspect of business that we undertake, so that we bring integrity to all of our dealings.

The prevention and reporting of any activity which is in contravention of this Policy is the responsibility of all employees throughout the Company.

1. Corporate and Social Responsibility

The Company takes their Corporate and Social Responsibility very seriously as it touches many parts of our business from the work place, the market place to the local community. Our business aims to provide a service both the local business communities and local populations.

As an Employer

- The Company is an Equal Opportunities Employer and will ensure that all opportunities are available to every person regardless of their situation in relation to age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.
- The Company will ensure that all staff members are treated with dignity and respect
- The Company will ensure that employment is freely chosen, and that workers are free to join a trade union.
- The Company believes in training and continually developing their staff by a comprehensive Induction Training Programme and an on-going Training programme to ensure that our business and individuals prosper

Local Communities

- The Company's aim is to bring local jobs to local people
- The Company ensures our Consultants are trained in the importance and legislation surrounding the issues of equal opportunity and diversity.
- The Company works with local education institutes allowing students to gain valuable work experience and advice
- The Company works with the Job Centre to get people into work
- The Company works with the local community to identify and correct skill shortages by offering training to get candidates into their ideal role and has the ability to test candidates and identify their most suitable career paths

Local Business Communities

- The Company's aim is to support local businesses by supplying suitably skilled and experienced candidates into their temporary and permanent positions
- The Wise Recruitment Group will comply with all relevant laws, regulations and standards
- The Company offers Employment Law advice and ensures that their customers are legally aware
- The Company offers accurate information on local salary expectations
- The Company offers all of their clients a tried and tested candidate attraction scheme ensuring vacancies are open to the whole of the local community
- The Wise Recruitment Group commits to providing a high quality service to its customers and this is endorsed by our accreditation to ISO 9001:2015 and our membership to the recruitment industry's governing body The Recruitment & Employment Confederation (REC).

2. Human Rights – Dignity at Work

The Wise Recruitment Group is committed to respecting everyone's human rights in all aspects of our Business and this policy applies to all employees who must comply with the law and with the principles of this policy. Any breach of this policy may result in an investigation and/or disciplinary action.

It is everybody's responsibility to maintain a work environment where everybody is treated with respect and in a manner that allows them to maintain their dignity at all times and is free from bullying and harassment. If any employee believes that someone is violating this Human Rights Policy or the law, they are asked to report it immediately to Head Office.

Our commitment is to provide an inclusive working environment where all people are treated fairly and with respect. We respect the right of our employees to join or not to join a trade union and as such they are free to join an organisation of their choice to represent them in line with local legislation.

Labour rights: We provide fair working conditions for our employees and agency workers including terms and conditions of employment/engagement, remuneration, working hours, resting time, holiday entitlements, maternity/paternity leave and benefits; we comply with all applicable legislation.

Wages: We are committed to ensuring that our employees and Agency Workers are not paid lower than that required by law. We require our suppliers to comply with all applicable legislation.

Forced Labour (Slavery): We have a zero-tolerance policy towards acts of modern slavery which are unlawful and are a violation of fundamental human rights. Further details can be found in our Preventing Modern Slavery and Hidden Labour Exploitation Policy. We require our clients to comply with all applicable legislation as well as adhering to our values and supporting us in the delivery of our commitment.

Safe and Healthy Workplace: We are committed to delivering high standards of health and safety management and will comply with all relevant legislation. Further details can be found in our Health & Safety Policy document.

Child Labour: The Wise Recruitment Group complies with all relevant legislation in relation to Child Labour. We do not employ or engage any person under the age of 16. We ensure that workers aged 16 to 17 do not work for more hours than allowed.

3. Environmental Responsibility

As a service provider, our impact on the environment is low. However, the Company is environmentally aware and does what it can to consider our impact on the environment when carrying out our business activities. The company is committed to reducing its Carbon Footprint and has implemented a Carbon Reduction Plan.

The Organisation has set objectives and improvement targets and these are monitored and reviewed on an annual basis. The objectives, targets and results are communicated throughout the organisation. The Wise Recruitment Group will:-

- Develop environmental best practice in our working environment
- Continuous improvement in our environmental performance by regular benchmarking and review against measurable objectives and targets
- Comply with associated environmental legislation and other requirements
- Regularly communicate performance to our employees

4. Competition, Anti Bribery, Corruption & Fraud

Bribery, corruption and fraud exposes The Company, its employees and business partners to the risk of criminal prosecution in addition to harming The Company's reputation. Accordingly, The Company operates a zero tolerance policy towards all forms of bribery, corruption and fraud. The Company's policy applies to all individuals working at all levels and grades within The Company, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers and other associated persons acting on behalf of The Company, wherever located.

The Company opposes all forms of bribery and corruption, large as well as small. The Company prohibits the offer, gift or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment, facilitation payments or the use of other routes or channels to provide improper benefits to customers, agents, contractors, suppliers or employees of any such party of government officials.

The Company also prohibits any group employees or business partner from arranging or accepting a bribe, facilitation payment or kickback from customers, agents, contractors, suppliers, or employees of any such party or from government officials, for their own benefit or that their family, friends, associates or acquaintances.

Group employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by The Company. Any concerns must be reported to a Director of the Company immediately.

Competition Law

The Wise Recruitment Group will not participate in any form of anti-competitive behaviour such as price fixing, bid rigging or disclose/exchange commercially sensitive information. We will not form or join any Cartel or form any other anti-competitive agreement, and we will not abuse any dominant position we may have or gain in the market.

Bribery

A bribe is an inducement or reward which is offered, promised or provided in order to gain improperly any commercial, contractual, regulatory or personal advantage. Bribery is a criminal offence and can take many forms. It is not possible to provide an exhaustive list of examples of bribery or corruption which may be made directly or indirectly through a third party. However, some examples may include:

1. The direct or indirect promise, offering or authorisation of anything of value
2. The offer or receipt of any kickback, loan, fee, reward or other advantage
3. The giving of aid, donations or voting designed to exert improper influence
4. Payments for lavish or inappropriate entertainment or travel
5. Favours including offers of employment
6. Facilitation payments
7. Inflated commissions
8. Fake consultancy agreements

“Anything of value” includes cash, gifts, travel expenses, entertainment, offers of employment, provision of free services, and business meals. It may also include event sponsorships, consultant contracts, fellowship support and charitable contributions made at the request of, or for the benefit of, an individual, his or her family, or other relations, even if made to a legitimate charity.

Kickbacks are typically payments made in return for a business favour or advantage, kickbacks usually involve the return of a percentage of a sum of money already requested or received, typically as a result of pressure, coercion or a secret agreement. A kickback can be initiated and received by a corrupt individual, usually simultaneously with or after the completion of a business transaction.

Fraud

Fraud is wrongful or criminal deception intended to result in financial or personal gain. The company values its reputation for financial and probity and reliability. It recognises that over and above any financial damage suffered, fraud may reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to fraud by:

1. Instituting and maintaining cost effective measures and procedures to deter fraud.
2. Taking firm and vigorous action against any individual or group perpetrating fraud against the Company or its Customers.
3. Encouraging its employees to be vigilant and to report any suspicion of fraud, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
4. Rigorously investigating instances of alleged fraud and pursuing perpetrators to seek restitution of any assets fraudulently obtained and the recovery of costs.
5. Assisting the police and other appropriate authorities in the investigation and prosecution of those suspected of fraud.

Anti-Money Laundering Statement

The Wise Recruitment Group (Swindon) Limited, does not operate in a sector which is covered by the Money Laundering Regulations, and does not make or accept cash payments exceeding £10,000 for a single transaction.

Therefore, The Wise Recruitment Group is not required to register with the HMRC under the regulations, and is not required to adopt procedures to comply with the Regulations.

5. Whistleblowing Policy

The Wise Recruitment Group is committed to conducting its business with honesty and integrity and aims to achieve the highest possible standards of service and ethical standards in all of its practices. We expect all staff to maintain the same high standards too; however, all organisations face the risk of malpractice and wrongdoing. We take malpractice and wrongdoing very seriously and aim to prevent and eliminate any wrongdoing or malpractice within the organisation.

We therefore encourage all staff to raise any concerns they may have about malpractice or wrongdoing within the organisation freely and without fear of suffering a detriment or dismissal to enable us to eliminate and prevent wrongdoing or malpractice within the organisation. We will treat any concerns raised seriously and will protect and support any individual who makes a disclosure in line with this policy.

This policy applies to all current and former employees, workers, officers, consultants, contractors of our business, including home workers, trainees, apprentices, agency workers, casual workers and limited company contractors.

When to Use this Policy?

- This policy should be used to report concerns of malpractice or wrongdoing in relation to our organisation's activities where you have information which you reasonably believe tends to show one or more of the following:
 - that a criminal offence has been committed, is being committed or is likely to be committed
 - that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject
 - that a miscarriage of justice has occurred, is occurring or is likely to occur; or
 - that the health or safety of an individual has been, or is being or is likely to be endangered; or
 - that the environment has been, is being or is likely to be damaged; or
 - that any of the above malpractices have been, are being or are likely to be deliberately concealed. This applies whether the malpractice has already occurred, is currently in progress, or is likely to happen in the future.

You must reasonably believe that the disclosure is being made in the public interest. It doesn't matter if you are mistaken about your concern but you must have information that tends to show some malpractice or wrongdoing rather than an opinion or a feeling.

Disclosures that are not covered by this Policy

- You will not qualify for protection under this policy if you commit an offence in making the disclosure, or if you disclose a matter that is subject to legal, professional privilege (for example, correspondence between The Wise Recruitment Group and their lawyers regarding a specific case).
- If your concern relates to your own treatment as an employee of The Wise Recruitment Group, including personal circumstances at work, you should raise it under our grievance procedure instead, unless you

reasonably believe that the matter is in the public interest. If your concern relates to your own treatment or personal circumstances at work but you are not an employee of The Wise Recruitment Group, you should use our complaints procedure instead of the grievance procedure. Our Complaints Policy is available upon request.

- If you wish to raise a concern of suspected malpractice or wrongdoing in relation to a hirer's activities, you may need to raise the concern directly with the hirer instead.
- Any other concerns about our services generally which are not related to the types of wrongdoing or malpractice covered by this policy should be raised using our complaints policy instead.

How to raise a concern

- If you have any concerns of the types of malpractice or wrongdoing covered by this policy, you should in the first instance make a disclosure to your immediate superior. Agency workers should disclose concerns to the consultant who is responsible for managing their assignment.
- If, for any reason, you feel that you cannot tell your immediate superior, or in the case of an agency worker the consultant responsible for managing your assignment, you should raise the issue with Jo Fisher, Administration Manager; jof@wiseemployment.co.uk.
- If you have made a disclosure and are still concerned, or the matter is so serious that you feel you cannot discuss it with either of the two persons named above, you should raise the matter with the following director: Lorraine Hill, Finance Director, lorraine@wiseemployment.co.uk.
- A disclosure of a concern can be made by telephone, in person or in writing (including by email). However, it is preferable for the disclosure to be made in writing so that we can keep an exact record of your concern. You are not expected to prove the truth of your concern beyond reasonable doubt or provide any evidence; however, you will generally need to provide the following information as a minimum: the nature of the concern; why you believe it to be true; the background and history of the concern; and relevant dates where possible.
- You can raise any concerns anonymously; however, we encourage you to give your name when reporting your concern wherever possible because it may be more difficult for us to protect your position or give you feedback on the outcome of investigations if you choose to remain anonymous.
- You may wish to consider discussing your concern with a colleague before raising it formally under this policy. You can also choose to raise a concern under this policy alone or with a colleague; however, it is in the interests of all parties to maintain confidentiality once you have raised a formal concern.

How we respond to concerns raised under this policy

- We are committed to ensuring that all disclosures raised in accordance with this policy will be dealt with objectively, consistently, fairly and professionally. We will take the time to listen to any issues raised and arrange a meeting as soon possible to discuss your concern (unless the concern has been raised anonymously). The aim of the meeting will be to establish the background and facts in order to help us decide whether and how to carry out any subsequent investigation. We may ask you for further information about the concern raised, either at this meeting or at a later stage.

- After the meeting, we will decide how to respond. This will usually involve making internal enquiries in the first instance, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time. We will keep you informed of the progress of the investigation as it is carried out and when it is completed, and give you an indication of the timescale for any actions or next steps that we may take. We cannot inform you of any matters that would breach any duty of confidentiality owed to others.
- We will consider any concerns raised anonymously at our discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources. However, concerns that are expressed completely anonymously are much less powerful and are difficult to investigate. It may also be difficult for us to provide you with feedback if you cannot be contacted.
- If disciplinary or other proceedings follow the investigation, we may need to ask you to come forward as a witness to help us take appropriate action to end the wrongdoing.

Confidentiality

- All concerns raised will be treated as confidential and every effort will be made not to reveal the identity of any individual who raises a concern. Unless the law requires otherwise, we will only make disclosures to third parties or other staff with your consent.

Protection and support for those raising concerns

- We hope that all staff will feel able to voice their concerns freely under this policy. The Wise Recruitment Group is committed to good practice and high standards and to being supportive of staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- Any individual raising a genuine concern must not suffer any detriment as a result of doing so. If you believe that you have suffered such treatment, you should inform Jo Fisher, Administration Manager immediately.
- The Wise Recruitment Group will not tolerate any harassment or victimisation of individuals who raise concerns about wrongdoing or malpractice in the workplace. No member of staff may threaten or retaliate against an individual who has raised a concern. Any person involved in such conduct may be subject to disciplinary action
- To ensure the protection of all our staff and the integrity of our business, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or not made in the public interest may also be subject to disciplinary action.
- If you are not happy with the way in which a matter has been addressed or dealt with you should raise it formally using our complaints procedure. Employees of the Wise Recruitment Group can use our grievance procedure to address the issue instead.

6. Gifts and Hospitality

Giving and receiving ordinary and usual business hospitality and entertainment and promotional or other business expenditure which seeks to improve the image of The Company and its service or to establish or cement cordial relations is recognised as an established and important part of doing business. This Group's policy does not prohibit reasonable and proportionate hospitality and promotional or others similar business expenditure (offered or received) intended for any of the foregoing purposes.

The policy **does prohibit** the offer or receipt of gifts, hospitality or expenses whenever they could influence or be perceived to be capable of influencing the outcome of a contractual or material business transaction. This may be the case if timed around particular business decisions.

All Group employees have been instructed that, if they are confronted with a request or demand it must be immediately rejected and reported to a director of The Company.

Group employees shall comply with all internal procedures notified to them governing the award of contracts to suppliers of goods or service to The Company. These procedures will include such safeguards as may be imposed from time to time to ensure adequate transparency around the commercial terms on which goods and services are supplied and, where appropriate, the benchmarking of those terms.

Monitoring and Review

The directors of The Company will monitor the effectiveness and review the implementation of The Company's policy, regularly considering its suitability, adequacy and effectiveness.

Any person who has any questions whatsoever concerning the requirements of The Company's policy should consult a Director of the Company.

Keith Robinson, Managing Director