

Group Supplier Code of Conduct

Our Intent

At PageGroup, we pride ourselves on being a reputable and honest business with high ethical standards in everything we do. The suppliers we work with naturally reflect on our reputation and it is important to us that our suppliers also meet our standards, as we believe they form the cornerstone of good business practice. As a recruitment specialist, every day we deal with highly confidential information which can have a significant impact on the current employment and future careers of our candidates, and on the prospects for the companies we work with. In particular, candidates have the right to expect that their information is treated with the utmost respect by whoever has access to it, whether a PageGroup employee or one of our suppliers.

We therefore ask our suppliers to adhere to our Supplier Code of Conduct and to promote our standards within our supply chain. They reflect aspects of business conduct and reflect how we would expect to treat suppliers and in turn be treated ourselves. The Code covers third parties, consultants and contractors engaged to provide goods and services to or on behalf of PageGroup, and is a statement of our basic requirements rather than a maximum standard.

Our Objectives

The elements covered by this code of conduct fall into three key areas:

- Quality of service:
 - Supplier standards.
 - Service management.
- Confidentiality and business ethics:
 - Confidentiality and data protection.
 - Anti-bribery and corruption.
 - Use of association.
- Treatment of employees and the environment:
 - Health and safety.
 - Anti-modern slavery.
 - Equality and human rights.
 - Social and environmental responsibility.

PageGroup will seek appropriate assurance from suppliers that they comply with our Code of Conduct through our procurement tendering process and through periodic review of compliance. The scope of review would be dependent on the nature and delivery of the service and may range from self-assessment through to independent audit.

Our Responsibilities

PageGroup's Chief Executive Officer is the executive sponsor of this policy. Implementation of this policy is delegated to regional directors. This policy will be reviewed on an annual basis to take into account business, legislative and other changes.



Steve Ingham
Chief Executive
PageGroup

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Quality of Service

Supplier Standards

We expect our suppliers to:

- Operate under the principles of best practice for the goods and services that they are providing.
- Comply with all the regulations and legislative requirements relevant to the provision of the goods and services in the countries in which they operate;
- Only work with reputable businesses.
- Have active membership of any professional bodies relevant to the goods and services they provide, or operate under a similar policy that adheres to industry best practice.
- Declare any conflicts of interest that may impact commercial arrangements with PageGroup.

Suppliers and their employees must not do anything that would or could be deemed to bring PageGroup into disrepute.

Service Management

We expect our suppliers to have suitable and sufficient insurance coverage for the goods and services they provide to the PageGroup and to have adequate business continuity procedures in place to ensure continuity of service. These procedures must be tested on a regular basis to ensure they are robust.

Confidentiality and Business Ethics

Confidentiality

Suppliers must:

- Comply with all privacy and data protection laws in respect to personal data including its collection, storage, processing and transmission. The sharing of such information must be strictly in accordance with the purpose for which it has been collected and only shared in accordance with law and regulation. Where personal information has, or appears to have, been released or become available to one or more non-authorised recipients, the supplier must inform the Company Secretary of PageGroup immediately.
- Have policies and procedures in place to ensure that any information provided by PageGroup is retained securely and confidentiality. Once such information is no longer required by the supplier, the information and all copies thereof must be destroyed by the supplier.

Anti-Bribery and Corruption

Suppliers commit to adhere to the requirements of anti-bribery and corruption legislation in that they will not engage in, consent to or connive in any activity, practice or conduct which would constitute an offence under such legislation (including the UK Bribery Act 2010).

The supplier will put in place, maintain and comply with adequate procedures to prevent any person associated with it committing an offence under such legislation, including any inducements or reward to a person for the improper performance of that person's position, or participation in any form of corrupt practice.

Use of Association

Suppliers must not publicly disclose their association with PageGroup in any form without first securing the written permission of the Group Marketing Director. In addition suppliers must not use the PageGroup logo or any other logo or brand owned by PageGroup without the prior written permission of the Group Marketing Director. PageGroup reserves the right to withdraw permission at its sole discretion.

Treatment of Employees and the Environment

Health and Safety

Suppliers must adhere to all the relevant health and safety legislation and standards in all countries of operation and in consideration of the services being provided. They shall actively ensure that they operate a safe working environment for all employees, visitors and other persons affected by their activities, and that suitable and sufficient health and safety policies and procedures are in place and communicated to staff as required. Appropriate training on health and safety matters must be provided to supplier employees, including relevant refresher training as required.

Suppliers, including any sub-contracted suppliers, must adhere to relevant PageGroup health and safety regulations when engaged in activities at any of our locations.

Suppliers must have a process in place to allow employees to report any health and safety issues without fear of intimidation as well as a process to track and manage such reports.

Equality and Human Rights

At PageGroup we believe staff employed by our suppliers, whether permanent or temporary, should have the same basic rights to be treated with respect and dignity at work as our own employees. There should be no discrimination based on race, caste, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. Suppliers must commit to a workplace free of harassment and abuse, and have in place a policy recognising, respecting and protecting the human rights of their employees, stakeholders and communities within which they operate.

Child labour must not be used and the policies and procedures relating to the employment of children should conform to the relevant International Labour Organisation standards.

Employment is to be chosen; there must be no forced, bonded or involuntary prison labour. Supplier employees must not be required to lodge monies or identity papers and must be free to leave employment after the giving of reasonable notice.

Further, supplier employees must have access to relevant training and personal development and be freely allowed to associate with others, form and join (or refrain from joining) organisations of their choice and bargain collectively without interference.

Wherever possible work performed should be on the basis of a recognised employment agreement as defined by national law and practice.

Suppliers must follow all applicable laws and regulations with respect to working hours and days of rest. Overtime must be voluntary and paid. Suppliers should also ensure that all employees receive at least the legally mandated minimum wage and benefits for the country in which they are employed.

Social and Environmental Responsibility

We expect our suppliers to operate in a socially responsible manner and contribute to the sustainability of the community. This should be under an appropriate CSR policy and also with adherence to the applicable local and national laws and regulations relating to the protection of the environment.

We seek continuous improvement in the reduction of our adverse impact on the environment and expect our suppliers to support efficiency programmes and opportunities to help meet this aim. This includes the reduction in consumption of non-renewable energy forms and the encouragement of recycling where possible.

Suppliers must be willing to reasonably co-operate with PageGroup in the drafting, preparation, commissioning and operation of sustainable processes. They must be willing to provide reasonable data concerning the environmental impact of the provision of their goods and services to PageGroup so that PageGroup can use such data as it deems appropriate.