



# Employee **Code of Conduct**

PageGroup



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# Introduction

A message from  
**PageGroup CEO**  
**Steve Ingham**

## Employee Code of Conduct

With world-renowned and fully integrated brands across more than 40 countries, PageGroup is well established as a worldwide leader in specialist recruitment. To maintain the trust and respect of our clients and candidates as we drive our business to even greater success, it's vital that we conduct our business with high standards of ethics and integrity.

That means more than just complying with both the spirit and the letter of the various laws and regulations that govern us. It also means leading by example in the way that we do business and in the way we behave towards our colleagues, candidates, clients, business partners and investors.

This Code of Conduct sets out the standards of behaviour expected of all of us. Of course, the code can't detail the specific behaviour required in every situation and the relevant policies also apply. But it can and does serve as the moral code by which we can all judge what is right and appropriate.

Not following the code could result in breaching laws and regulations and, of course, damage to our reputation. For individuals it could also mean disciplinary action or dismissal. It's therefore essential that you're familiar with the code, and that you follow it. If you have any questions or concerns about what the code means or how you should behave in a particular situation, contact your line manager or local HR team for advice.

I am relying on everyone in PageGroup to play their part in ensuring that Page Executive, Michael Page, Page Personnel and Page Outsourcing continue to be brands we can all be proud of.

**Steve Ingham**  
CEO



## Our Code

### Introducing the **PageGroup Code of Conduct**

Our Employee Code of Conduct has been created to help you understand our core values and the behaviours expected to support them. It provides guidance and support for every PageGroup employee worldwide, with high standards of ethical behaviour and compliance with local laws and regulations being essential to protecting the reputation and long term success of our business.

We must constantly live up to our values so our clients, candidates, stakeholders and colleagues are confident they can put their full trust in us. As a global business we operate in a complex network of law, regulation and policy. Regional or local PageGroup offices may add to this Code to reflect specific local requirements, customs or best practice. Local laws or policies always prevail when they are more strict than this Code. If you are in any doubt about the meaning or applicability of a rule or regulation please seek advice from your local PageGroup HR team.

### **Am I doing the right thing?**

**Q: What should I do if this Code and the law conflict?**

**A:** First and foremost, you must always comply with the law. The Code will usually be stricter than the law requires, in which case you will follow the Code.

### **Your commitment to this Code**

Every PageGroup employee worldwide must comply with our Code. You must make time to read and understand this document. If you have any questions, or need advice please speak to your local HR team.

# Our Code

## Living up to **our purpose and values**

As one of the world's largest recruitment companies, our purpose states that '**PageGroup changes lives for people through creating opportunity to reach potential**'. It is the reason we are in business and is underpinned by core values which have always been at the heart of our business.

### OUR Purpose

**PAGEGROUP**  
**CHANGES LIVES**  
*for*  
**PEOPLE**  
*through creating*  
**OPPORTUNITY**  
*to reach*  
**POTENTIAL**

### OUR Values

Our values form a platform for the motivation of our people, and our approach to business and society as a whole. More than just words, our values are the essence of our brand and influence the way we work every day.

WE MAKE A **DIFFERENCE**

WE **ENJOY** WHAT WE DO

WE VALUE **DETERMINATION**

WE WORK AS A **TEAM**

WE ARE **PASSIONATE**

# Our Code

## Your **responsibilities**

Everyone in our business has particular responsibilities, including:

- Leading by example
- Promoting and role-modelling good ethical behaviour and business conduct including complying with all laws and regulations
- Ensuring you have access to and receive training on ethical issues and policies relating to this Code
- Promoting an environment where your colleagues feel confident and able to raise ethical concerns and that they are taken seriously and followed-up

## **Zero tolerance**

While this Code gives you guidance for certain situations there are specific areas where we have a zero tolerance policy:

- Unsafe, illegal or unethical working practices
- Violence and aggression
- Discrimination, bullying and harassment in relation to sexual orientation, gender identity, race, colour, religion, age, disability, gender, marital status, union membership or political affiliation
- Bribery and corruption
- Retaliation against anyone who speaks up and does the right thing

# Our Code

## Speak Up

### Speak Up?

Speak Up is the reporting of suspected wrongdoing at work by an employee, the company or a supplier or business partner. Our Speak Up policy exists to help you speak up in situations where you suspect dangerous, illegal, harmful or fraudulent activity is taking place, or when you or your colleagues are being treated unfairly. PageGroup conducts its business to the highest standards of integrity and honesty, and we expect you to maintain these same standards in everything you do.

### To work out the right thing to do in any situation, ask yourself:

- Is it legal?
- Is it ethical?
- Does it comply with PageGroup policy?

If the answer to any of these is 'no' then we expect you to speak up.

### Who should I speak to?

If you see or hear something you think is wrong or dishonest while you're at work, please speak to your manager or call our dedicated Speak Up line. Contact details can be found on your local country intranet and pinned to the All Company Yammer group.

## Am I doing the right thing?

**Q:** I'm worried about being penalised or treated differently if I speak up

**A:** If you suspect wrongdoing you should always report it. Remember that you have the right to remain anonymous so your identity does not need to be revealed. Should you wish to disclose your name however, and subsequently experience any form of retaliation or harassment, PageGroup will investigate and take appropriate action in accordance with local HR policies and procedures.



## Our People

### Workplace and personal **safety**

We work to ensure the workplace safety of our employees, candidates and clients. Workplace includes your normal place of work but also company events and travel on company business. We expect all our employees to play their part in making PageGroup safer and ensuring their team has the right equipment, training and knowledge to guarantee a safe working environment.

#### Am I doing the right thing?

- Ensure you know where to find our safety, security and crisis management policy and procedures
- Ensure you know who your first aiders and fire wardens are
- Understand the hazards associated with your work and where to find risk assessments
- Make sure you are adequately trained for the work you do
- Help us to maintain tidy offices so we can ensure your safety and that of your colleagues
- Adhere to our travel policy so you remain safe and can access support when on business travel
- Report any accident, incident, near-miss, injury, ill health, unsafe act, hazard or fault so the right action can be taken
- Know what your emergency evacuation routes and procedures are

Quite simply, if it isn't safe, don't do it. Stop and inform your manager. If you have any health and safety concerns please speak to your line manager, office manager or your local Facilities Management team.

# Our People

## ♀♂ Diversity, equality and inclusion

We promote a diverse, inclusive and equal workplace both internally and externally. Every employee is expected to treat everyone with whom we have contact with dignity, courtesy and respect.

At PageGroup we treat our colleagues, candidates, clients and business partners fairly and on merit. We hire, promote and reward our employees based on their capabilities and skills. Gender, race, colour, ethnic or national origins, marital status, family circumstances, age, disability, sexual orientation, gender identity, political or religious belief are not relevant to personal and team performance at work.

Our employees and candidates have the right to work in a safe environment free from discrimination, bullying or harassment. We support and uphold human rights principles and international standards. We will not tolerate, engage in or support the use of, forced or child labour. This expectation extends to all our business partners and suppliers, we want all our potential suppliers to understand how important diversity and inclusion is to PageGroup, so we will take into consideration suppliers who can demonstrate that they hold diversity, equality and inclusion in similar regard. This is reinforced in the PageGroup Procurement Policy and Supplier Code of Conduct.

### ! Am I doing the right thing?

**Q:** Your team's line manager is becoming increasingly hostile to a colleague of a different ethnicity. You feel the atmosphere in the team is worsening, particularly as other team members are following your manager's lead. What do you do?

**A:** Raise your concern with your Director. Alternatively you can raise your concern with HR or through our Speak Up service.

# Our People

## Harassment-free workplace

Every PageGroup employee has the right to a working environment free from harassment and intimidation. We recognise that being a global firm means operating in many countries with differing laws. We are sensitive to these and to cultural and social differences. However, our principles are universal and are reflected in the laws of every country in which we operate. We have a zero-tolerance approach to harassment and intimidation.

### What constitutes harassment?

Harassment is unwanted conduct which is reasonably considered to have the purpose or effect of:

- Violating the recipient's dignity
- Creating an intimidating, hostile, degrading, humiliating or offensive environment for the recipient

At all times every employee has a personal responsibility to behave in a manner that is not offensive to others. Line managers and Human Resources are responsible for communicating this policy to employees and for investigating any complaints of harassment against any member of their team.

### Am I doing the right thing?

#### Q: Does harassment have to be physical?

A: Absolutely not. Harassment can also be verbal or non-verbal. Words and gestures can be just as offensive as physical acts. Jokes, obscene gestures, sarcastic remarks, suggestive or insulting sounds, stories or racial comments can be classed as harassment and can create a hostile working environment

## Drugs and alcohol

PageGroup is a drug-free workplace. While at work and attending business-related activities (e.g. client meetings) in any location you are strictly prohibited from using or being under the influence of alcohol or illegal drugs. From time to time the Company may organise events or occasions where alcohol is served (on or off premises). You are always expected to drink responsibly at these times.

# Our People

## Sustainability

We believe that developing a sustainable business is not only the best way to help look after our environment, but also contributes to delivering a successful and ethical company. Our environmental impact is relatively small, but we all still have a responsibility to look after it.

For our clients and candidates, this can be an important issue as an increasing number seek to do business only with companies who have a clear understanding of their impact, and have policies in place to try and reduce their impact. At a corporate level, PageGroup has an environmental policy and criteria which we include in our judgement of the suitability of any potential new office space.

### Am I doing the right thing?

#### **Q: What can I do to help the environment?**

A: You can be mindful of the impact on the environment as you undertake your day-to-day duties at PageGroup. Think about opportunities for recycling or cutting down on the amount you print each day. Also consider whether a conference call could be a potential alternative to an internal meeting that requires travel; or car sharing if going to an off-site meeting.



## Our Business

### Bribery and corruption

PageGroup operates a zero tolerance policy to bribery and corruption. We do not offer or accept bribes or improper inducements, including facilitation payments, to secure business or to gain any advantage for either the Company or for any individual. We do not abuse our position for personal gain or advantage and actively refrain from any misleading or deceptive accounting or financial reporting practices.

We expect you to comply with the Group's Anti-Bribery and Corruption Policy and all bribery and corruption-related legislation. You must take all reasonable steps to ensure everyone you work with does the same.

### Gifts and hospitality

Maintaining high quality professional relationships with our clients and candidates is essential to the success of our business. Sometimes we provide or receive business courtesies, such as reasonable entertainment and modest gifts. However, we never allow these courtesies to affect our ability to make objective, professional decisions or give the perception that our objectivity has been compromised.

Refer to your line manager or director on what is and isn't acceptable.

### Am I doing the right thing?

**Q:** You have recently pitched for some work with a new client, competing against three other agencies. You are awaiting their decision. In the meantime your director has allocated you tickets to a major sporting event and has asked you to invite your clients. This particular client is top of your list – should you invite them?

**A:** No, you should not. PageGroup's success is built on trusted and long term relationships which you are encouraged to forge with your clients. On this occasion, however, your gesture could be seen as an attempt to influence them and win their business.

# Our Business

## Conflicts of interest

We avoid conflicts of interest. Always act in the best interest of PageGroup. Don't let your personal interests conflict – or appear to conflict – with the Company's interests. Even the perception of a conflict of interest can damage our business and reputation. This happens when your personal interests could affect your judgement and conflict with PageGroup's interests. Conflicts of interest can arise in many situations. Where requested, you should always disclose your interest to your line manager and remove yourself from the decision-making process.

### Am I doing the right thing?

**Q: Your client asks for your help. Her daughter is looking for a job and she would like you to interview her for a role at PageGroup. What should you do?**

**A:** Employing your client's daughter in your team may lead to a perceived conflict of interest. Speak to your line manager for advice and guidance. However, opportunities to employ talented people should not be overlooked but this must be a fully transparent process and in accordance with our HR procedures. You should remove yourself from any potential hiring process as it could lead to a conflict of interest now or in the future.

## Family and friends

We take special care to ensure that our personal interests do not conflict with our PageGroup responsibilities. You should not directly or indirectly supervise, or use influence to favour, anyone with whom you have a family or close personal relationship, including family members.

In certain circumstances, and at PageGroup's discretion, it may be necessary to reassign someone to avoid a conflict of interest, or to take steps to maintain a harmonious and productive work environment. Interviewing, hiring or engaging a family member or close personal friend as an employee, consultant or business partner creates a conflict of interest. You must disclose any such relationship and remove yourself from the decision-making process.

### Am I doing the right thing?

**Q: Your brother-in-law wants to work in recruitment and would like to be interviewed for a role as a consultant. What do you do?**

**A:** You should disclose this relationship to your manager and ask another manager or director in the business to meet him. You cannot be involved in the interview or decisions about employing him.

# Our Business

## Responsible partnerships with our suppliers

A responsible supply chain is critical to the success of our business. We work hard to ensure our partners share our responsible values and that we, in turn, treat them with trust and transparency. There should be no discrimination based on race, caste, religion, age, disability, gender, marital status, sexual orientation, gender identity, union membership or political affiliation. We want all our potential suppliers to understand how important diversity and inclusion is to PageGroup, so we will take into consideration suppliers who can demonstrate that they hold diversity, equality and inclusion in similar regard.

The PageGroup Suppliers Code of Conduct sets out our expectations of all our suppliers and our relationship with them.

We believe in the importance of equality in the workplace and being a responsible corporate citizen. We expect these same high standards from our suppliers. We're committed to preventing acts of modern slavery and human trafficking from occurring within our business and our supply chain.

We expect the people employed by our suppliers, whether permanent or temporary, to have the same basic right to be treated with respect and dignity at work as our own employees. We believe employment should be chosen. There must be no forced, bonded or involuntary labour. Supplier employees must not be required to lodge monies or identity papers in order to work and must be free to leave employment after giving reasonable notice.

## Dealing in PageGroup shares

Insider dealing is a criminal offence and highly unethical. Any instance will be reported to the relevant authorities and treated as gross misconduct.

Insider dealing is using confidential price-sensitive information to gain an unfair advantage when buying and selling shares of a publicly traded company.

All employees who come into contact with information which may affect PageGroup's share price must comply with PageGroup's Share Dealing Code, which places restrictions around dealing in the Company's shares by directors and certain employees.

If you have any queries about whether you require consent to deal in PageGroup plc shares, please contact the General Counsel & Company Secretary.



## Our Integrity

### Protecting **our assets**

We each have a duty to look after and respect all PageGroup's assets – namely our place of work, computer and telephone, company vehicle, finances or supplies you may have access to and even our working time. We should protect PageGroup's assets from misuse, theft and waste. We must also ensure other companies cannot gain an unfair advantage by accessing important information about our business.

#### **You should:**

- Use company resources responsibly and appropriately at all times and always considering the same level of care you would have with yours
- Ensure hardware, such as laptops, phones and other handheld devices, are never left in public or insecure places
- Ensure all sensitive, confidential and personal information you may handle stays secure
- Ensure business expenditure is accurately and honestly accounted for

If you have any questions please contact the IT Service Desk

### Am I doing the right thing?

**Q:** Can I use my work computer for personal use?

**A:** Yes. Limited personal use is permitted but this should never interfere with your work and/or other employees' work.

# Our Integrity

## Information management and security

Information is one of our most valuable assets that we depend on in order to function effectively and we should protect it. Information could be in many forms from email, databases and voicemail, as well as paper-based communication, photos and videos.

### You should:

- Share information only with people authorised to access it
- Appropriately protect information and passwords, whatever its format
- Keep information for as long as it is legally, commercially and practically necessary

### Am I doing the right thing?

**Q:** I have a confidential report I need to share with my manager and other team members – what do I need to do to ensure it is safe to send?

**A:** When sharing confidential documents, make sure it is password protected and you send it to the intended recipient via the Yammer group called '**StaySecure – Global Information Security**'.

# Our Integrity

## Data protection/**confidential** information

The very nature of our business means we handle personal information about our employees, candidates and clients every day. We have an important duty to respect this information and ensure it is protected and handled responsibly and only used for the purposes for which it is provided. We take our obligations under data protection and privacy laws across the world very seriously. Almost every country in the world has local data protection laws that must be considered.

We all have a role to play in protecting people's personal data. Make sure you understand your legal obligations under data protection laws. Ask your legal team if you are unsure.

### Am I doing the right thing?

**Q:** You notice a team is gathering personal details about candidates from social media in case the information could be used in the future. The team doesn't inform the candidates that they are gathering the data, in case the candidates refuse to have their personal data used in this way.

**A:** If you gather someone's personal data, you must tell them that we are doing so and what we will use the data for. Speak to your line manager or legal team for advice and support – they can help to find a way of processing the data in compliance with data privacy regulations.

## Political **relationships**

In your professional role as a PageGroup employee you should not get involved in any political activity or make a donation to a political party. We encourage you to remain politically neutral at all times.

We do, however, understand that you may wish to involve yourself in your own time and respect your right to do so. When this happens you must make it clear that the views you express are your own.

## Corporate **governance**

We are open, honest and cooperative with our regulators. We ensure that the information we provide them is accurate and complete. The Board is collectively responsible for the company's financial and operational performance, as well as for promoting the success and sustainability of the business.

The Board fulfils its responsibilities by directing and supervising the company's strategy and policies.

# Our Integrity

## Communicating with **the outside world**

Any communication with external stakeholders, such as our clients, shareholders, charity foundations or even the media, must be clear and truthful.

When using communication channels such as email, SMS and social media, whether on behalf of the company or via your own personal accounts, take care. Always be respectful, compliant with the law, and do not say anything controversial, insulting or defamatory. Remember, once you have made a statement, you have no control over who uses it, or how it is used. The eventual audience may not be the one you intended to address.

If you are communicating on behalf of the company, always make sure you follow our branding and tone of voice. For guidance you can refer to our online 'Marketing Resource' or contact your local marketing team.

If you are contacted by a journalist or other external agency and you are not an authorised spokesperson, please refer them to your local marketing team without responding or passing on any information.

Finally, remember that internal communication can just as easily make it into the outside world. Always make sure you apply the same diligent and responsible approach to your communications within PageGroup.

### Am I doing the right thing?

**Q: You have been approached by a journalist who is writing an article on the employment market – she is keen to get your views as an expert in the industry. What should you do?**

**A:** Refer the enquiry to your communication team in Group Marketing. They will work with you to ensure our response is consistent with our values and corporate direction, or will find the best PageGroup spokesperson for the subject.

# Our Integrity

## Financial and non-financial **accounting and reporting**

We have an obligation to our business, investors, clients and candidates to ensure that we report openly, honestly and accurately on our business performance. Accurate record-keeping protects our reputation.

You must always:

- Accurately and fairly report all business transactions and performance metrics
- Complete all expense claims accurately and in line with the employee business expense procedure
- Maintain records in accordance with legal requirements

### Am I doing the right thing?

**Q: You have made a placement and processed the invoice but your candidate backs out before the end of the month. What should you do?**

**A:** You must immediately process the reversal and remove the reported revenue. No placement has been made at this stage so we cannot report the revenue.

**Q: You have received an expenses claim form with a large number of items associated with client meetings, including transport, food and beverages. Is it acceptable for you to put all costs through as 'Client Entertaining'?**

**A:** No. Lumping costs together stops us from accurately analysing our expenditure which then affects cost control. All costs must therefore be recorded appropriately.



## Anti-Competitive practices

### **Anti-Competitive** practices

You must not engage in anti-competitive practices. Breaching competition law has serious consequences including fines of up to 10% of global turnover and criminal prosecution of individuals.

Cartel behaviour is the most obvious form of anti-competitive behaviour and is strictly prohibited. Agreements that fix market prices or other market conditions such as discounts, commissions or rebates, or that limit or share control of markets or technical development and/or sources of supply are equally unacceptable.

In any market where PageGroup may have a dominant position, we must be careful to ensure we do not impose any unfair terms or tie clients unfairly to our services. If you are meeting our competitors you should have a protocol approved by the legal team and put in place prior to the meeting.

PageExecutive

MichaelPage

PagePersonnel

PageOutsourcing

Part of  
PageGroup