

Ethical Trading Policy

1. Purpose

The purpose of this Ethical Trading Policy is to establish the standards and guidelines that govern ethical business practices throughout our supply chain and operations. This policy ensures that all trading activities conducted by Ultimate Recruitment are carried out in a socially responsible and sustainable manner. We are committed to upholding human rights, labour rights, environmental protection, and fairness in our trading relationships, in accordance with local and international laws and standards.

2. Scope

This policy applies to all employees, suppliers, contractors, and business partners involved with Ultimate Recruitment. This includes all business relationships from the procurement of goods and services to the recruitment and treatment of employees and workers at all levels.

3. Ethical Trading Principles

Ultimate Recruitment adheres to the following core ethical principles in all our operations and trading relationships:

3.1. Fair Labour Practices

- **No Forced or Child Labour:** We do not engage in, nor support, the use of forced, bonded, or child labour. All workers must have the legal right to work, with full freedom to leave employment as per contractual terms. We comply with international labour standards, including the International Labour Organisation (ILO) conventions on child labour.
- **Fair Wages and Working Hours:** Workers must be compensated fairly, in accordance with local laws, and paid at least the minimum wage. Wages must be paid in a timely manner and reflect the work performed. Overtime pay must be provided where applicable and working hours should comply with local labour laws and international standards.
- **Non-Discrimination and Equal Opportunity:** We ensure that recruitment, compensation, promotion, and termination practices are free from discrimination based on gender, race, ethnicity, age, religion, disability, sexual orientation, or any other protected characteristic. Equal opportunity is provided to all employees, ensuring a fair and inclusive work environment.

3.2. Health, Safety, and Welfare

- **Safe Working Conditions:** Ultimate Recruitment is committed to ensuring that all workplaces, both our own and those of our partners, are free from any health and safety

risks. Employers must comply with relevant health and safety regulations and provide a safe working environment where employees can perform their tasks without risk to their well-being.

- **Access to Healthcare and Welfare:** We promote and support the physical and mental health of all workers, including access to healthcare and reasonable accommodations where needed. Adequate facilities for rest, clean drinking water, and access to sanitary facilities should be provided in all workplaces.

3.3. Environmental Responsibility

- **Sustainable Practices:** We are committed to reducing the environmental impact of our business operations and supply chain. We will work with suppliers and partners to ensure that environmental considerations are taken into account, including waste reduction, energy efficiency, and the use of sustainable resources.
- **Compliance with Environmental Regulations:** Ultimate Recruitment and our suppliers must comply with all applicable environmental laws and regulations. We encourage responsible sourcing, recycling, and the use of materials that minimise harm to the environment.

3.4. Transparency and Integrity

- **Honesty and Integrity in Business Dealings:** Ultimate Recruitment will operate with the highest standards of integrity and honesty in all transactions. We require all employees, suppliers, and business partners to engage in transparent practices, ensuring that our activities are conducted in a responsible and ethical manner.
- **Anti-Bribery and Corruption:** We maintain a strict anti-bribery and anti-corruption stance. Bribery, kickbacks, or any form of unethical payments in exchange for business advantages will not be tolerated under any circumstances. We require that all employees, suppliers, and business partners follow applicable anti-corruption laws and report any suspected illegal activity.

3.5. Human Rights and Social Responsibility

- **Respect for Human Rights:** We are committed to respecting and promoting human rights across our supply chain. This includes ensuring that workers have the right to freedom of association, freedom of speech, and the right to engage in collective bargaining, where applicable. Ultimate Recruitment will also not engage in or support any activities that infringe upon the basic rights of individuals, including human trafficking, discrimination, or abuse.
- **Community Impact:** We strive to positively impact the communities where we operate by supporting local economies, respecting local cultures, and contributing to sustainable development initiatives. We engage with local communities in a way that fosters trust, collaboration, and mutual benefit.

4. Supplier and Partner Expectations

Ultimate Recruitment expects all suppliers, contractors, and partners to comply with the principles outlined in this policy. We actively seek out partners who share our commitment to ethical trading and sustainable practices. Our key expectations for suppliers and partners include:

- **Compliance with Laws and Regulations:** All suppliers and partners must comply with local, national, and international labour laws, environmental laws, and industry regulations.
- **Commitment to Ethical Standards:** Suppliers and partners must uphold the ethical standards detailed in this policy, particularly concerning labour practices, human rights, health and safety, and environmental responsibility.
- **Regular Auditing and Monitoring:** We will conduct regular audits and assessments of our suppliers and partners to ensure compliance with ethical standards. These audits may include site visits, interviews with workers, and review of relevant documentation to assess working conditions and environmental practices.

5. Grievance Mechanism and Reporting

We encourage all employees, suppliers, and partners to report any unethical practices, violations of this policy, or concerns related to unethical trading. Ultimate Recruitment has a grievance mechanism in place that allows individuals to report issues confidentially and without fear of retaliation. Reports can be made through:

- HR Department (internal grievances)
- Whistleblowing Hotline (anonymous reporting)
- Email Address (Christian@ultimaterecruitment.com)

All grievances will be thoroughly investigated, and appropriate action will be taken to resolve the issue.

6. Training and Awareness

Ultimate Recruitment is committed to educating and training employees and suppliers about the importance of ethical trading. We will offer regular training sessions on this policy, emphasising:

- Human rights and labour standards
- Health, safety, and environmental regulations
- Anti-bribery and anti-corruption laws
- Reporting mechanisms and ethical decision-making

We will ensure that all employees involved in the recruitment process and supply chain management are aware of this policy and its requirements.

7. Compliance and Enforcement

Compliance with this Ethical Trading Policy is mandatory for all employees, suppliers, and business partners. Failure to comply with this policy may result in disciplinary actions, including but not limited to:

- Termination of employment (for employees)
- Termination of contracts or business relationships (for suppliers or partners)
- Legal action, if required by law

Ultimate Recruitment reserves the right to take corrective actions and require remediation if ethical breaches are identified.

8. Review and Updates

This Ethical Trading Policy will be reviewed annually to ensure it remains relevant and effective. Any necessary updates or changes will be communicated to employees, suppliers, and business partners in a timely manner.

July 2025