

CORPORATE SOCIAL RESPONSIBILITY & ETHICAL CONDUCT POLICY

Policy Statement

Carmichael^{UK} is committed to operating its business in a manner that is both sensitive and responsible with proper regard to its legal obligations and according to relevant directives, regulations and codes of practice. It is also committed to supporting the Government's vision for Corporate Social Responsibility in terms of businesses taking account of their economic, social and environmental impacts, specifically:

- Promoting business activity that brings simultaneous economic, social and environmental benefits.
- Encouraging innovative approaches and continuing development and application of best practices.
- Ensuring best minimum levels of performance in areas such as health & safety, the environment and equal opportunities.
- Creating a framework that facilitates business practices that balance profit and success with achievement of social and sustainability goals.
- Taking an active part in supporting the local community and social causes.
- Creating real opportunities for local people and local enterprise development.
- Providing a rewarding, challenging and great place to work.

Policy Scope

This policy applies to all employees of CarmichaelUK who are expected to act in line with the elements noted within it. This policy is freely available on our website.

Policy Elements

The company recognises that its operations have an effect on the communities and environment in which it operates. In light of this, the company is committed to operating in a socially responsible manner, supporting a number of local communities and social causes, as well as operating in an environmentally sustainable manner.

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Local Community & Social Responsibilities

Carmichael^{UK} is proud to support local community projects as well as a range of deserving and charitable causes. To prevent funding or charitable donations from being misappropriated or interpreted as a bribe, we carry out appropriate due diligence to ensure that the recipients are bona fide and that money raised is used for its intended purpose. This includes ensuring that donations are made to legitimate organisations or that beneficiaries are identified.

It is our objective to ensure that charitable donations, contributions or sponsorships genuinely benefit the causes to which they are given and that funds are not misappropriated or interpreted as bribery.

As a company we will carry out due diligence to ensure that the recipients of any donations, contributions or sponsorships are bona fide and that the funding will be used for the purpose that it is intended. We will do this by ensuring that donations are only made to registered charities or that the recipients of any other donations are researched to ensure that they are legitimate and the beneficiary (be that an individual, company or charity) is identified and approved in advance unless otherwise authorised by the Managing Director. Additionally, we will maintain an audit trail of all donations and sponsorships to enable them to be monitored to ensure funds are being used as agreed.

Our Staff

We are committed to ensuring that we provide a motivational, fulfilling and fun environment in which to work. We focus hard on recruiting and retaining the best people, recognising their achievements and rewarding their efforts. We believe that much of our success can be attributed to the company's core values which are embedded throughout the organisation. Everybody within our company is expected to adhere to our values of honesty, integrity, professionalism and proactivity.

Clients & Candidates

Carmichael^{UK} is an active member of the Recruitment & Employment Confederation (REC). We encourage and support our consultants to become members of the REC giving us the assurance that we are fair and professional in our dealings with both clients and candidates. As members of REC, we also abide by their codes of conduct and meet all legislative and best practice standards.

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Environmental Management Programme and Objectives

Whilst Carmichael^{UK} does not produce any emissions or pollutants that come under the Integrated Pollution Prevention and Control Regulations, the company has identified that its most significant impacts on the environment include:

- Disposal & recycling of waste (including paper, consumables and electronic equipment).
- Energy & water usage.
- Transport and company car usage.
- Purchase of consumables.
- Maintenance of buildings.

Methods for meeting the objectives within the Environmental Management Programme include maximizing the reuse, recycling and sustainable disposal of waste and minimising unnecessary energy usage and waste. The company is working towards becoming net zero and is educating employees around its objective towards this goal. We hold ISO 14001 and PAS2060 accreditations and our Environmental Policy contains further details.

Equal Opportunities

It is the aim of Carmichael^{UK} is to create an environment that encourages and values diversity within its workforce and builds on the differences individuals bring, enabling the company's continued success. We aim to draw upon the widest possible range of views and experiences in order to meet the changing needs of our staff, clients and partners.

We seek to promote diversity and to respond to the needs of all individuals in a fair and equitable manner, whilst observing our commitment and responsibility to current legislation (including the Equality Act 2010).

Our approach to equal opportunities applies equally to both our own employees and the way in which our recruitment services are offered to clients and candidates. Our Celebrate programme deals with recruitment of people who have barriers to entry and aims to reach out to local communities irrespective of their backgrounds. This programme is managed by the Board of Directors and forms an important part of delivering on our CSR commitments.

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Health & Safety

It is the Company's duty to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all employees. This requires that regard is paid in particular to:

- Maintaining safe premises, as well as a healthy and safe working environment.
- Providing and maintaining safe systems at work.
- Providing health and safety information and training.
- Publishing and regularly updating a Company Safety Policy.
- Ensuring safety in the use of articles and substances.
- Conducting special risk assessments for expectant, new mothers and young persons.
- Providing such information, training, instruction and supervision as is necessary to ensure the health and safety at work of all employees.

Carmichael^{UK} has a separate health and safety policy along with procedures and processes to ensure that we keep all employees safe and free from harm. This policy may be found on our website. We hold ISO 45001 accreditation and we are audited each year on our compliance.

Ethical Purchasing & Procurement

Carmichael^{UK} is committed to procuring its works, goods and services in an ethically and environmentally sensitive way, yet with proper regard to its commercial obligations, ensuring that suppliers deliver to agreed timescales, quality and cost. Purchasing is undertaken in a manner that encourages competition, and offers fair and objective evaluation of offers from all potential suppliers.

Purchase of goods and services with an annual value in excess of £10,000 excluding VAT will be conducted according to the following principles:

- Completion of a business case to evidence the need to purchase.
- Procurement practices will be transparent, auditable and fair.
- Research will be conducted to ensure a clear understanding of the risks associated with the purchase of goods and services, and purchasing decisions will include contingency and risk mitigation strategies.
- Tendering (if appropriate) is based on both quality and cost, and is evaluated in a fair, objective, and structured manner that actively encourages competition.

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- We will encourage all protected groups/communities to participate in the procurement process.
- Company employees responsible for purchasing will not accept corporate gifts, or any type of solicitation that could be construed as enticement.
- The procurement process demonstrates that the approach taken to competition is rigorous, balanced and driven by service needs and market intelligence.
- Potential suppliers are ethical, sensitive to the environment and operate within EU and UK legislation and uphold similar ethical and moral standards to Carmichael^{UK}. Carmichael^{UK} reserves the right to investigate the ethical record of potential new suppliers before entering into any agreement and to request information from suppliers regarding the production and sources of goods supplied.
- 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 policy.
- Suppliers are able to demonstrate their ability to deliver continuous improvement and cost savings throughout the life of the contract.
- Business transactions will, where possible be conducted electronically.
- Carmichael^{UK} will deal only with suppliers who can demonstrate that they oppose all forms of modern slavery.

Information & Confidentiality

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. The company will at all times ensure that it complies with all applicable requirements of data protection legislation in force from time to time.

Conflict of Interests, Corporate Gifts & Hospitality

Carmichael^{UK} holds the trust and confidence of those with whom it deals, including clients, suppliers and employees as fundamental to its success. Conflicts of interest potentially undermine the relationship of the Company with its partners. In order to help preserve and strengthen these relationships, the Company has developed rules and guidelines concerning the conduct of its officers and employees aimed at minimising the possibility of conflicts of interest.

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The Bribery Act 2010 states that “genuine hospitality or similar business expenditure that is reasonable and proportionate” is not illegal and should not be counted as bribery. Employees, however, may not accept corporate hospitality or gifts which could be considered an incentive or enticement, particularly if they have the potential to place the recipient under any obligation or if they have the potential to create any type of conflict of interest.

Any corporate gifts or hospitality (whether being given or received) must be disclosed to and approved by the Managing Director prior to being given / accepted. Details of such gifts including the purpose of the gift, the giver and recipient, the nature of the gift or hospitality, its value and who has approved it must be fully documented in the Gifts/Hospitality Register. This register will then be audited by the Managing Director on a quarterly basis. Any corporate gift must be given openly (not in secret) in the name of the company and not be construed as coming from a particular individual. Gifts should not include cash or a cash equivalent.

Corporate gifts are aimed at thanking customers or suppliers for their loyalty and custom and not as an incentive or inducement for future favourable treatment or business.

Promotional gifts without significant value (e.g. stationery, chocolates, or other gifts under the value of £75) need not be disclosed, but should be shared with other employees. If it is felt that any gift received might constitute an act of bribery, then the gift must be passed to the Managing Director who will return it to the donor explaining the company policy.

Carmichael^{UK} will operate in accordance with the policies, procedures and restrictions of its clients in relation to corporate hospitality, gifts or incentives where such information forms part of a contract or has been specified in writing to the company.

The Anti-bribery and Anti-Corruption policy, which is available on our website, sets out in detail the stance of Carmichael^{UK} in respect the giving and receiving of corporate hospitality and gifts.

Human Rights

Carmichael^{UK} is vehemently opposed to the use of slavery in all forms; cruel, inhuman or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion. 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.

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 or who breaches the human rights

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of those affected by the organisation's activities, in compliance with the Modern Slavery Act 2015.

Responsibilities of Carmichael^{UK}

It is the direct responsibility of the Managing Director supported by the members of the Board to ensure compliance with this policy on a day- to-day basis.

Responsibilities of Employees

All employees of CarmichaelUK have a responsibility to accept their personal involvement in applying this policy. They must be familiar with the policy and ensure that it is followed by themselves, other employees, contractors, temporary workers, and suppliers for whom they are responsible.

Approval & Review

This policy will be reviewed once a year to ensure continuing suitability with business requirements. As necessary additional alterations may be made from time to time in the light of legislative changes, operational procedures, or other prevailing circumstances. This policy has been approved by the Board of Directors.

