



Supplier Code of Conduct Policy – Big Red Recruitment

1. Introduction

At Big Red Recruitment Ltd, we are dedicated to maintaining the highest ethical and professional standards in line with our company Values and Code of Conduct.

Our relationship with suppliers is vital in achieving excellence. The Supplier Code of Conduct supplements our internal policies, setting out the standards for all suppliers, ensuring compliance with relevant laws in their operating countries.

Choosing reputable partners who share our commitment to ethical practices is crucial. This Code formalises our expectations, ensuring that regardless of location or service provided, our suppliers meet our high standards.

Suppliers must comply with this Code and mirror our ethical practices. We're committed to supporting them in meeting these standards. In return, we expect suppliers to cascade these principles to their own network of suppliers.

We encourage our suppliers to surpass the outlined requirements, fostering best practices and continuous improvement. Even if local laws differ, adherence to this Code is essential for suppliers working with us.

2. Our People

At Big Red Recruitment Ltd, our workforce and candidate base is representative of diverse talents and backgrounds, contributing to our success in the digital and technology recruitment landscape in the UK. Embracing this diversity is integral to our present and future achievements.

2.1 Fair Treatment and Equal Opportunity

We are committed to fostering an environment of trust, respect, and inclusivity, where diversity is celebrated, and each individual is valued for their unique skills. We uphold the rights of our employees and candidates and expect the same principles from our partners and suppliers. Big Red Recruitment Ltd requires that employment decisions, including hiring, compensation, benefits,



promotion, termination, and retirement, are based on qualifications and capabilities, free from biases related to personal attributes.

Discrimination based on gender, race, ethnicity, sexual orientation, gender identity or expression, religion, political affiliation, disability, age, marital status, caring responsibilities, or nationality is strictly prohibited within our organisation and among our suppliers.

We ensure equal opportunities for all employees and candidates, particularly maintaining fairness in the treatment of marginalised groups.

2.2 Respectful Workplace

Every individual at Big Red Recruitment Ltd deserves a workplace free from harassment and violence. We have a zero-tolerance policy towards any form of harassment or violence against our employees and candidates, and we expect our suppliers to uphold the same commitment.

Our suppliers are obligated to treat all workers with dignity and respect. Practices involving corporal punishment, physical, sexual, psychological, or verbal harassment or abuse are strictly prohibited. Monetary fines are not to be utilised as a disciplinary measure.

2.3 Human Rights

Respect for human rights forms the core of our business values at Big Red Recruitment Ltd. We are committed to upholding internationally recognized Human Rights principles as delineated in the International Bill of Rights, encompassing various global declarations and conventions. This commitment extends to our operations, ensuring the protection and promotion of Human Rights for our workforce, partners, and the communities we engage with.

We require our suppliers to align with these Human Rights principles and:

Refrain from engaging in child labour, complying with local laws stipulating minimum employee age requirements, ensuring young workers (where legally permissible) are protected from hazardous work and provided proper education.

Participate in legitimate apprenticeship programs in adherence to applicable laws and regulations.



2.3.2 Forced Labour and Modern Slavery

At Big Red Recruitment Ltd, we unequivocally denounce the use of forced or involuntary labour, including any forms of bonded labour, human trafficking, or exploitation. We strictly prohibit any engagement in the procurement of commercial sex acts.

We mandate that work within our organisation and among our suppliers is voluntary, and employees have the right to terminate their employment in accordance with applicable laws. We prohibit the imposition of fees or expenses related to recruitment, travel, document processing, or work visas on workers.

When subcontracting recruitment and hiring services, companies working with Big Red Recruitment Ltd must ensure that labour agencies are legally operating, certified or licensed by the relevant authorities, and uphold ethical standards to prevent any risk of forced labour or human trafficking.

Moreover, our suppliers must not demand that workers surrender government-issued identification documents, passports, or work permits as a condition of employment. Retaining personal documents to bind workers or restrict their freedom of movement is strictly forbidden.

Clear and comprehensive employment contracts must be provided to workers in a language they understand, outlining their rights, obligations, wages, working hours, and other employment conditions before deployment. We strictly prohibit the use of supplementary agreements or contract substitution that diminishes workers' rights.

No worker at Big Red Recruitment Ltd or within our supplier network shall be compelled to pay deposits or security payments at any time.

We demand that our suppliers implement robust procedures to prevent any form of involuntary or forced labour, ensuring a workplace free from harsh or inhumane treatment. Disciplinary policies should be humane, clearly communicated, and devoid of any physical or mental coercion, verbal abuse, or wage deductions.

Furthermore, physical or sexual violence, harassment, intimidation, or threats against workers, their families, or associates are strictly prohibited.



2.3.3 Wage and Benefits

Big Red Recruitment Ltd requires suppliers to adhere to local minimum wage laws and provide legally mandated benefits. Overtime work must be compensated at legally stipulated rates.

2.3.4 Working Hours

Suppliers are obligated to ensure that workers do not exceed 48 hours a week on average - normally averaged over 17 weeks, unless they have opted out of the maximum 48 hour working week.

All overtime work must be voluntary and compensated at prevailing rates. Workers are entitled to at least one day off in a seven-day period, barring exceptional business conditions.

2.3.5 Freedom of Movement and Personal Freedom

Workers' freedom of movement should not be unreasonably restricted. Mandating residence in employer-operated premises as a condition of employment is prohibited at Big Red Recruitment Ltd. Coercive measures to confine workers or restrict their personal freedom are strictly forbidden.

2.3.6 Freedom of Association and Collective Bargaining

At Big Red Recruitment Ltd, we value open communication and engagement between workers and management. We support and respect workers' rights to associate freely, communicate openly with management about working conditions, and exercise lawful rights of free association and collective bargaining without fear of reprisal, harassment, or penalty.

2.3.7 Confidentiality

Suppliers are both expected to comply with the provisions in our contracts and any legal requirements to protect commercial and sensitive information. Suppliers may both also be party to confidential information that is necessary to be effective partners. This information, even if it is not covered by contractual provisions, should be handled with the same care as information of similar sensitivity. Notwithstanding this mutual understanding, suppliers should recognise that this does not



prevent us from disclosing information where we are compelled to do so, for example, by law or parliament, or to comply with the principles stated in PPN 01/17: Update to Transparency Principles.

2.3.8 Conflicts of Interest

We expect suppliers to mitigate appropriately against any real, potential or perceived conflict of interest through their work with Big Red Recruitment in accordance with PPN 04/21: Applying Exclusions in Public Procurement, Managing Conflicts of Interest and Whistleblowing. A supplier with a position of influence gained through a contract should not use that position to unfairly disadvantage any other supplier or reduce the potential for future competition, for example by creating a technical solution that locks in the supplier's own goods or services.

2.3.9 Whistleblowing

We expect suppliers to have a comprehensive whistleblowing policy which allows employees to report any incidents or concerns anonymously, safely and without repercussion in accordance with PPN 04/21: Applying Exclusions in Public Procurement, Managing Conflicts of Interest and Whistleblowing.

3. Our Values

At Big Red Recruitment Ltd, we are deeply committed to upholding the highest standards of integrity, honesty, transparency, and professionalism across all our operations within the UK and internationally. We abide by local laws and steadfastly reject engagement in any form of corrupt practices, including bribery, extortion, or fraud.

We expect our suppliers to share and demonstrate a similar commitment by understanding and complying with all relevant laws and regulations. Suppliers must foster trust, act ethically, and encourage open and honest dialogue.

3.1 Bribery, Corruption, and Facilitation Payments

Bribery in any form, whether offering, providing, or receiving something of value for improper advantages, is strictly prohibited at Big Red Recruitment Ltd. Facilitation payments, defined as small



sums paid to officials to ensure the performance of their duties, are illegal under UK legislation and are unacceptable in any situation.

Corruption encompasses various activities such as bribery, fraud, collusion, and abuse of power. Any involvement in bribery, corruption, or facilitation payments can severely harm our reputation and business relationships.

We categorically forbid the offering, giving, or receiving of bribes, improper payments, or engaging in corrupt activities, whether directly or through third parties. Our suppliers must adhere to these stringent principles and refrain from participating in any form of commercial bribery or kick-back schemes.

Suppliers acting on behalf of Big Red Recruitment Ltd must comply with anti-bribery laws and all local regulations related to bribery.

Additionally, suppliers involved in transactions related to services for our company must refrain from offering or accepting any inducements or advantages that are dishonest, illegal, or breach trust.

Suppliers must implement robust procedures to ensure their employees comply with anti-corruption laws and these standards.

Agents, consultants, or contractors working with us must operate in line with our standards, particularly regarding bribery and corruption.

3.2 Gifts and Hospitality

Building long-term relationships based on trust and respect is paramount for Big Red Recruitment Ltd. While exchanging gifts and hospitality can foster goodwill, they should never influence or appear to influence decisions improperly.

Suppliers should not offer any gifts, meals, or entertainment that might influence or appear to influence decisions made by our employees. However, modest and customary gifts, meals, or entertainment consistent with business practices and policies may be acceptable, provided they are not frequent, expensive, or against the law.



We urge suppliers not to succumb to inappropriate influence or pressure through the acceptance of unsuitable gifts or hospitality. If faced with such situations, suppliers are encouraged to inform us immediately.

We mandate our staff to document any gifts or hospitality given or received.

3.3 Conflicts of Interest

Conflicts of interest undermine fairness and violate the integrity we expect at Big Red Recruitment Ltd. They can compromise legality and tarnish our reputation.

Suppliers should avoid any interaction that might conflict with the best interests of Big Red Recruitment Ltd or appear to do so. For instance, they should refrain from employing or providing payments to our employees during any transaction (apart from contractual obligations). If there exists a familial or any other relationship that might constitute a conflict of interest, suppliers should disclose this information to us or ensure our employee does so.

Suppliers must also notify us of any Organisational Conflicts of Interest that could hinder future collaborations between Big Red Recruitment Ltd and the same client.

3.4 Competition and Anti-Trust

At Big Red Recruitment Ltd, we are committed to upholding fair competition and complying with anti-trust laws that ensure an environment of free and open competition, prohibiting practices like bid rigging, price fixing, cover pricing, and market sharing. Violating these laws can result in severe fines, penalties, and even imprisonment for individuals involved.

We staunchly advocate for fair and ethical competition within our markets. Our decisions regarding pricing, customers, bids, and market strategies are independently made by us, ensuring adherence to laws that promote and safeguard fair competition.

We expect our suppliers, especially when preparing proposals, bids, or engaging in contract negotiations for Big Red Recruitment Ltd and our clients, to ensure that all communications and



representations are accurate and truthful. Suppliers serving us internationally must understand and comply with all relevant export laws and regulations.

Our suppliers are prohibited from sharing any information obtained from or about our competitors, their bids, or bids made to our competitors. Maintaining confidentiality regarding competitive information is imperative.

It's crucial to report any suspicions or instances of anti-competitive behaviour witnessed within the business environment.

We emphasise the importance of our suppliers inspiring trust by taking responsibility, adhering to ethical practices, and fostering honest and open dialogue.

4. Our Assets

At Big Red Recruitment Ltd, we are committed to operating as a sustainable and reputable business. Our assets, including tangible and intangible resources such as financial holdings, property, time, and information, are integral to our success and preparedness to confront challenges. Suppliers partnering with us have a crucial role in safeguarding these assets.

The services we deliver rely significantly on our human and informational resources.

4.1 Financial Integrity

Our policies emphasise that no employee shall engage in any activity designed or construed to perpetuate fraud or evade taxes. We expect our suppliers to uphold these same high standards.

Fraud constitutes a criminal offense in most jurisdictions, involving deception and dishonesty to gain material advantages. Fraudulent activities include deliberate deception, dishonest actions, or abusing positions for unjust gains. It can encompass defrauding the company, customers, or third parties, misappropriation of property, misreporting of time or expenses, tax evasion, or money laundering.

Suppliers associated with Big Red Recruitment Ltd must never seek or allow any advantage gained through fraudulent means or deception, whether it involves defrauding the company, misreporting



expenses, tax evasion, or any form of misappropriation. Honesty, fairness, and thoroughness in handling responsibilities are expected at all times.

4.2 Confidential Information and Records

Information is deemed confidential if it holds value for Big Red Recruitment Ltd and is not publicly accessible. Suppliers might also come across confidential data from our employees, customers, or partners.

Both Big Red Recruitment Ltd employees and suppliers have a shared responsibility to safeguard confidential information from unauthorised access or misuse. Suppliers must exercise caution in handling, discussing, or transmitting sensitive or confidential information that could impact the company, its employees, partners, or the public. The obligation to maintain confidentiality extends even after the conclusion of their contract or assignment with us.

Should a supplier receive confidential information in error, they must promptly notify their contact at Big Red Recruitment Ltd and refrain from further distribution.

To protect others' confidential information, suppliers should refrain from disclosing any information related to another company if contractual or legal obligations prohibit sharing such data.

4.3 Personal Information

Big Red Recruitment Ltd recognises the importance of respecting and responsibly handling personal information, ensuring it is protected and used solely for its intended purposes.

Suppliers are required to manage personal information in compliance with applicable laws and regulations, adhering to Data Protection Principles. This includes processing information fairly and lawfully, obtaining it for specific and legitimate purposes, maintaining accuracy, ensuring security, and not transferring information without adequate protection measures in place.

5. Raising Concerns



Suppliers associated with Big Red Recruitment Ltd who suspect that an employee of the company or any individual acting on behalf of the company has engaged in illegal or otherwise inappropriate conduct are encouraged to report such matters to Big Red Recruitment Ltd.

Suppliers should promptly report any potential violation of the company's Code of Conduct. Reports can be made via email to hayleyr@bigredrecruitment.co.uk. We take all reports seriously and ensure confidentiality and appropriate investigation of all concerns raised.

Big Red Recruitment Ltd is committed to providing channels for reporting concerns and maintains an environment where individuals can express their apprehensions without fear of reprisal. We encourage transparency and integrity in our operations, and your reports help us uphold these values.