



Business Ethics Policy and Procedures

1. Anti-Corruption and Bribery Policy

1.1 Policy Statement:

LucyJames Recruitment Ltd has a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly, and with integrity in all our business dealings.

1.2 Scope:

This policy applies to all employees, consultants, contractors, candidates, and third-party representatives.

1.3 Prohibited Conduct:

- Offering, giving, soliciting, or receiving any bribe or corrupt payment in any form.
- Using company funds or resources for unlawful or unethical purposes.
- Engaging in facilitation payments, kickbacks, or improper advantages.

1.4 Responsibilities:

- All staff must report any suspicion of corruption or bribery.
- Managers must ensure that those they supervise are aware of and understand this policy.

1.5 Reporting:

Concerns should be reported immediately to the Director. Reports will be treated confidentially and investigated promptly.

2. Anti-Trust and Fair Competition Policy

2.1 Policy Statement:

LucyJames Recruitment Ltd is committed to complying with all applicable competition and anti-trust laws. We believe in free, open, and fair competition.

2.2 Prohibited Conduct:

- Price fixing, bid rigging, or market sharing.
- Exchanging sensitive information with competitors.
- Abusing a dominant market position.

2.3 Responsibilities:

- Staff must avoid any conduct that could be seen as anti-competitive.
- All agreements and collaborations must be checked for compliance.

2.4 Reporting:

Any suspected anti-trust activity must be reported immediately to the Director for investigation.

3. Respect for People and Human Rights Policy

3.1 Policy Statement:

We believe everyone deserves to be treated with dignity and respect. LucyJames Recruitment Ltd promotes an inclusive, diverse, and supportive environment.

3.2 Prohibited Conduct:

- Discrimination on the basis of age, race, gender, disability, religion, sexual orientation, or any other protected characteristic.
- Harassment, bullying, or any inappropriate behaviour in the workplace or during client interactions.

3.3 Commitments:

- Promoting equal opportunity in recruitment, pay, training, and career progression.
- Supporting human rights and fair labour practices.
- Providing reasonable adjustments for individuals with disabilities.

3.4 Reporting:

All incidents or concerns must be reported to the Director. All complaints will be taken seriously and handled with care.

4. Whistleblowing and Non-Retaliation Policy

4.1 Policy Statement:

LucyJames Recruitment Ltd is committed to creating a transparent and accountable workplace. We encourage all employees, candidates, and third parties to report any concerns relating to unethical, illegal, or unsafe conduct.

4.2 Whistleblowing Protections:

- Reports can be made anonymously and will be treated in strict confidence.
- Whistleblowers will not suffer any detriment or disadvantage for raising a concern in good faith.

4.3 Non-Retaliation Assurance:

- Retaliation against anyone who raises a concern or assists in an investigation is strictly prohibited.
- Disciplinary action will be taken against any individual found to have victimised a whistleblower.

4.4 Reporting Channels:

- Concerns should be reported to the Director or via a designated confidential reporting line (to be established).
-

5. Code of Conduct Policy

5.1 Policy Statement:

The Code of Conduct at LucyJames Recruitment Ltd outlines the expected standards of behaviour for all staff, contractors, and representatives.

5.2 General Expectations:

- Act honestly, ethically, and professionally at all times.
- Treat colleagues, clients, and candidates with respect and courtesy.
- Follow company policies and procedures, including data protection and health & safety.
- Avoid conflicts of interest and disclose any potential concerns.

5.3 Professional Standards:

- Maintain confidentiality of sensitive information.
- Uphold a high standard of personal presentation and punctuality.
- Comply with client site rules and expectations when on assignment.

5.4 Disciplinary Measures:

- Breaches of this code may result in disciplinary action, up to and including termination of employment or engagement.

6. Compliance and Review

This policy will be reviewed annually or as needed. Breaches may result in disciplinary action, including termination or legal proceedings.