

## **Corporate Social Responsibility Policy**

### **1. Our business and values**

Educate Staffing Ltd is quickly becoming a leading supplier of supply teacher and teaching assistants throughout the UK and on an international platform. Ethics are at the heart of business offering and are one of the pillars of our business.

The Company's concept is to match high quality staff to suitable Locum opportunities at cost efficient and sustainable prices for our client base.

The Company is highly committed to conduct our business in a decent and ethical manner. This is our moral and ethical obligation and it is a core part of our values. For Educate Staffing Ltd, corporate social responsibility (CSR) means to continually strive for a high performance on labour standards, health & safety and environmental protection – at our own workplaces as well among our suppliers.

We also believe that high standards on CSR are critical for a company's development into a sustainable, modern and competitive business entity. CSR is an important competition parameter for both The Company and our suppliers. We therefore wish to cooperate with our suppliers through dialogue and a common interest in developing the business and mutually benefit from compliance with increasing CSR requirements.

### **2. Our approach**

All our suppliers must sign our code of conduct and respect the principles of the code. But we also acknowledge that the best way to ensure high ethical standards among our suppliers is not through control and enforcement. We therefore strive towards close collaboration and long term business relationships with our core suppliers. And we are willing to assist our suppliers in their efforts to improve labour, health & safety and environmental standards, and to comply with our code of conduct.

We do not wish to terminate business with suppliers that are not in compliance with our code of conduct, as long as suppliers are seriously committed to eventually complying with the standards. However, we will not conduct business with a supplier if future compliance with the standards is deemed impossible.

The Company reserves the right to monitor our suppliers' compliance with our code of conduct through our own announced or unannounced visits, or through audits performed by external agents appointed by The Company.

### **3. Our ethical principles**

The Company emphasises, that the code of conduct applies to all workers employed directly and indirectly by the suppliers of The Company, including contract workers and seasonal workers. The Company expects its suppliers to take the necessary steps, to ensure that contract workers and seasonal workers are also subjected to the rights, terms and conditions stated in this code of conduct.

#### *1. Forced labour*

The Company will not accept the use of forced labour, nor shall any employee be required to deposit identification papers or other personal documents with the employer. Workers shall be employed according to applicable laws and regulations and there shall be a contract (or appointment letter) written accordingly

#### *2. Working hours*

The Company's suppliers shall comply with applicable laws and industry standards on working hours and overtime. Employees shall have leave and time off from their job according to applicable

legislation, local traditions and standards

### 3. *Payment*

The supplier shall ensure that wages paid always meet at least legal or industry minimum standards and are paid at regular intervals. Overtime work must be reimbursed at a premium rate and the supplier shall provide its employees with all legally mandated benefits to which they are entitled

### 4. *Discrimination and disciplinary practices*

The Company will not accept any form of discrimination in hiring, remuneration, access to training, promotion, termination or retirement and workers shall not be subjected to behaviour, including gestures, language and physical contact, that is sexually coercive, threatening, abusive or exploitative

### 5. *Freedom of association and the right to collective bargaining*

The supplier shall respect the right of workers to join associations of their own choice and support workers in exercising their right to collective bargaining

### 6. *Health and safety*

The supplier shall provide a safe and healthy working environment and shall take adequate steps to prevent accidents, injury and harm to health of workers

### 7. *Environment*

The supplier shall comply with all local, regional and national environmental laws and regulations, and work actively to minimize negative effects on the external environment

### 8. *Traceability and documentation at intermediaries*

Intermediaries shall be able to document their CSR efforts in their own company as well as in the supply chain and they should be able to document the origin of products

### 9. *Cultural sensitivity*

The Company will respect the norms, culture and values of the countries in which we operate

## 4. **How we interpret our principles**

### *Forced labour*

Forced labour refers to all work that is not voluntary or that is demanded as repayment of debt (bonded labour). Fair and transparent employment contracts written in local language is an effective way of demonstrating that labour is not forced. All workers employed by The Company and our suppliers must have a contract or appointment letter signed by both the employer and the worker.

Deposit of identification papers or other personal documents with the employer will restrict the workers' freedom of movement, and should not be allowed. The workers should always be allowed to freely leave the Hospital premises when their work shift ends.

### *Working hours*

The normal workweek shall be as defined by national law, but shall not on a regular basis exceed 48 hours per week. Overtime work shall be as defined by national law, but shall not exceed 12 hours per week. Overtime work shall be voluntary and all workers shall have the right to minimum one day off per week. Leaves include sick/medical leave, annual/earned leave, maternity leave, national holidays, etc.

### *Payment*

Employers shall follow the development in minimum wages, and ensure that workers are always paid as a minimum what is defined by the minimum wage. In cases where industry minimum wages are applicable, these are to be paid if higher than the legal minimum wage.

Wages shall be paid at regular intervals (at least monthly) and on time. Workers shall receive details of wages on pay-slips, including information regarding overtime hours and any deductions made

The supplier shall maintain payroll and attendance records for all employees, including piece-rate and temporary workers. Any deductions from the wage shall be agreed between the worker and the employer, and be mentioned in the contract.

The supplier shall provide its employees with all legally mandated benefits to which they are entitled, such as medical insurance, social insurance, pensions, etc. The supplier has to continuously be updated on national regulations in this respect.

#### *Discrimination and disciplinary practices*

The Company does not accept any discriminative practices whether based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age. All workers shall be employed, trained, promoted and paid solely on the basis of their job performance. The supplier shall not engage in or support the use of corporal punishment, threats of violence, mental or physical coercion, or verbal or sexual harassment. The Company will not accept any harsh, inhumane or degrading treatment or punishment of workers.

#### *Freedom of association and the right to collective bargaining*

The supplier shall respect the right of all workers to form, join, and organise associations of their own choice and the supplier must respect the workers right to collective bargaining. The Company acknowledges that freedom of association also entails that workers are free not to join a union if they so wish. Collective bargaining is defined as negotiations between employer and employee representatives that are freely and independently chosen by the employees. Employers shall permit non-violent efforts to organise workers and carry out collective bargaining of employment conditions. It should have no direct or indirect negative consequences for any worker to initiate and participate in any such dialogue – on the contrary, employers should support such efforts.

In countries where the right to freedom of association and collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

#### *Health and safety*

The working environment must be safe and healthy in terms of noise, heat, illumination, ventilation and ergonomics. All workers must have access to clean restrooms and drinking water. The supplier shall ensure that worker dormitory facilities (if provided by the supplier) are clean, safe, and meet the basic needs of the workers.

The supplier should always first – if possible - eliminate risk, and second - if elimination is not possible - reduce risk, and ultimately protect workers from exposure to risks. Risk can involve – but is not limited to - exposure to hazardous substances and dangerous machines or activities. All workers shall have access to adequate personal protection equipment (gloves, masks, hearing protection, etc.) and all workers should be aware of the appropriate action in case of an accident or emergency. Training of all workers in health and safety is a fundamental part of health and safety management and should be provided to all workers.

#### *Environment*

The supplier shall ensure safe handling, storage and disposal of raw material, chemicals, waste, wastewater and air emissions. Suppliers must obtain and maintain the necessary environmental registrations, permits and licences. Waste, noise, odour and dust emission from production shall be minimized where possible.

#### *Traceability and documentation at intermediaries*

The Company respects our intermediaries' integrity and right to work with CSR in line with their own

values and strategies. However, intermediaries must be able to document that they do work with CSR and that this is carried out according to international principles – in their own companies and in their supply chain. An important part of this is the traceability of products. Knowing the conditions under which a given product is produced, requires that our intermediaries are able to trace the factories that produce the product.

*Cultural sensitivity*

The principles in The Company's code of conduct must be respected by all suppliers. However, The Company must also respect the norms, cultures and values in the countries in which we operate. We engage in dialogue with local CSR experts and the management and workers at our suppliers and evaluate our practices accordingly.