

# Notices and Policies

Policy	Key themes	Implementation	Due diligence	Reporting
<b>Anti-bribery and corruption policy</b> Related policy: Global procurement policy Supplier code of conduct	SThree Code of Conduct explicitly prohibits engaging in bribery or corruption in any form.  SThree Group-wide Anti-corruption and bribery policy describes our values, business behaviours and our commitment to doing the right thing. It outlines measures, governance and controls to mitigate bribery and corruption risk and reporting of breaches to our policy.  Our new Group procurement policy and supplier code of conduct, launched in 2022, provide additional clarity on responsibilities and expected behaviours of our suppliers, employees and business partners across our value chain.	Our policies are available to all employees and shared during on-boarding. In 2022, over 90% of our employees completed our expanded anti-bribery and corruption training. Policy changes are communicated across the group.  We complete financial risk checks on key clients and suppliers which includes identifying any historic or current issues surrounding bribery and corruption. Where appropriate, we put in place a risk mitigation/corrective action plan, or we reject them if we conclude that risks are too high.	All employees are required to accept and adhere to the policy. We also monitor the conduct of major suppliers and have a right of termination in the event of non-conformance with our anti-bribery and corruption contractual requirements.	Policy roll-out and acceptance by email is reported back to the Group HR teams.  Where appropriate, areas of non-conformance, measures to correct them, and any disciplinary actions, are included in internal audit reports.
<b>Human rights</b> Related policies: Supplier code of conduct Global DE&I policy Global procurement policy Whistleblowing policy (both employees and contractors)	We respect the rights and dignity of all our people and everyone we come into contact with.  We have embedded respect for human rights in our relevant practices and policies including Global DE&I policy, Global procurement policy and our Code of Conduct. They set out clear values and principles for every stakeholder to adhere to.  Our focus is on mitigating human rights violations from our full value chain, whether it be the clients we place talent in or the suppliers who provide services to our business.	Ethical recruitment is a key theme in the training and continuous learning of all of our people. Through our client and contractor engagements we ensure the right processes are in place to protect our candidates.  We conduct checks on new clients to ensure they meet our values and deliver regular check-ins with every contractor to ensure working conditions are as agreed.  In addition, we conduct checks on suppliers during tendering and on-boarding.	We have robust internal processes and formal guidance to identify, measure and address potential and actual human rights' violations across our business through people surveys, supplier questionnaires and risk assessments.  SThree commits to providing support for both the data subjects and those who whistle blow, with a comprehensive investigation launched.	We provide formal grievance mechanisms and the whistleblowing service available 24/7 to anyone who works for or with us, to facilitate the reporting, investigation and resolution of grievances, including those related to potential human rights violations, alleged fraud, corruption, illegal activity, bribery, criminal offences, damage to the environment, and endangering someone's health and safety.  Employees, contractors or other third parties are expected to immediately report any instances of unethical behaviour or suspicion of malpractice to a line manager, a member of the Group HR Team or through the whistleblowing hotline.

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<b>Modern slavery and human trafficking</b> Related policies: Global procurement policy Whistleblowing policy (both employees and contractors) Modern Slavery and Human Trafficking Statement Supplier code of conduct	Although the risk of modern slavery and human trafficking in relation to SThree is low, we monitor our supply chain to ensure we fully understand and mitigate the risk.	In 2022, the Directors assessed the risk of modern slavery in our key areas of operation. We also made appropriate supplier checks around governance and financial standing as part of our due diligence process.	We have processes in place to: <ul style="list-style-type: none"> <li>• identify and assess potential risk areas.</li> <li>• mitigate risks occurring in our supply chains.</li> <li>• continually monitor risk.</li> <li>• protect whistleblowers, via a confidential and independent reporting process.</li> </ul>	Any matter raised via the independent whistleblowing hotline is reported to our Head of Business Integrity. Matters raised via HR are reported to our Chief People Officer.  The Company's Modern Slavery Act statement can be found on our website.
<b>Health and safety (H&amp;S) policy</b>	The Group is committed to the health, safety and welfare of all current and potential employees.  Key arrangements outlined in the policy are: <ul style="list-style-type: none"> <li>• risk assessment.</li> <li>• work equipment.</li> <li>• monitoring H&amp;S procedures (inspection/audit regime).</li> <li>• managing third-party contractors.</li> <li>• emergency procedures.</li> </ul>	Employees are inducted into the business with an H&S briefing. We also provide support for our people in areas such as dependant care, absence management, flexible working, and information sharing.  We also extended SThree H&S arrangements to cater for employed contractor placements.  We have a system in place that helps us bridge our H&S policy with those of our clients and help to manage safety risk faced by contractors whom we place with our clients.	There is an H&S lead in every office to ensure we continue to provide a safe place for our people and visitors.  For contractors exposed to most serious risk, we conduct H&S and security checks/audits before a contract starts where required. We encourage our contractors to act in a way that is consistent with our and the clients H&S policies.	H&S concerns and incidents are reported to our H&S leads who promptly act on mitigating these risks with the local leadership teams.
<b>Data protection policy</b>	SThree is committed to compliance with the requirements of data protection and privacy laws relevant to its activities. To achieve compliance with legal requirements, SThree has dedicated and appropriately skilled resources assigned to manage our data protection programme. All employees are required to complete training and have access to specialists if they require assistance.	Each new employee is required to complete our Data Protection course, which provides: <ul style="list-style-type: none"> <li>• understanding the purpose of the principles.</li> <li>• requirements and liabilities.</li> <li>• the key roles and responsibilities.</li> <li>• how data protection processes are embedded within SThree businesses.</li> </ul> Continuous data protection learning is provided to all employees via our learning management platform.  In 2022, over 95% of our people completed data protection training.	SThree conducts periodical audits of the systems and processes implemented across the Group to validate its business strategy for legal compliance and to determine whether changes in the way SThree handles personal data necessitate updating these systems and processes.	Policy roll-out and completion of the mandatory course as part of the SThree Academy is monitored internally. Any breaches in policy are required to be immediately reported to the Data Protection team to investigate.