

Quality Management Policy

Goodman Masson operates a quality management policy which is based upon the following:

- Management responsibility
- Resource management
- Product and / or service realisation
- Measurement, analysis and improvement

Goodman Masson uses specialist software which enables the effective management of key processes and procedures and we are currently planning to formally document this. We recognise that a fully implemented Quality Management System is an important part of the continuous improvement methodology.

The following principles are currently upheld at Goodman Masson despite the fact that we are yet to acquire formal registration with ISO:

Principle 1 - Customer-focused Organisation: Organisations depend on their customers and therefore should understand current and future customer needs, meet customer requirements and strive to exceed customer expectations.

Principle 2 - Leadership: Leaders establish unity of purpose and direction of the organisation. They should create and maintain the internal environment in which people can become fully involved in achieving the organisation's objectives.

Principle 3 - Involvement of People: People at all levels are the essence of an organisation and their full involvement enables their abilities to be used for the organisation's benefit.

Principle 4 - Process Approach: A desired result is achieved more efficiently when related resources and activities are managed as a process.

Principle 5 - System Approach to Management: Identifying, understanding and managing a system of interrelated processes for a given objective improves the organisation's effectiveness and efficiency.

Principle 6 - Continual Improvement: Continual improvement should be a permanent objective of the organisation.

Principle 7 - Factual Approach to Decision Making: Effective decisions are based on the analysis of data and information.

Principle 8 - Mutually Beneficial Supplier Relationships: An organisation and its suppliers are interdependent and a mutually beneficial relationship enhances the ability of both to create value.

Health & Safety Policy

It is the policy of Goodman Masson Limited to ensure compliance towards the Health and Safety at Work Act 1974. This involves providing and maintaining safe and healthy working conditions, equipment and systems of work for all employees, and to provide such information and training as they need for this purpose.

Appropriate preventative and protective measures are, and will continue to be implemented following the identification of work-related hazards and assessment of the risks related to them.

It is also the policy of the Company to ensure that its business is conducted in a manner so as to reduce the risks to members of the public. The Company may require you to attend such training and or induction programmes in order to meet the safety objectives of the Company.

Goodman Masson Limited accepts its responsibility for health and safety of other persons who may be affected by the Company's activities.

The allocation of duties for safety matters, the identity of competent persons appointed with particular responsibilities, and the arrangements made to implement this policy are set out herein and in associated health and safety documented records.

This policy will be kept up to date, to reflect changes in the nature and size of the business. To ensure this, the policy and its effectiveness will be reviewed annually.

Company's responsibility

It is the duty of management to ensure the following:

- Providing and maintaining systems of work that are safe and without risk to health;
- Ensuring safety and absence of risks to health in connection with handling, storage and transport;
- Providing information, instruction, training and supervision;
- Consult with employees who may on the frontline observe risks earlier;
- Maintaining all places of work in a safe condition; and
- Providing and maintaining a safe working environment.

Your responsibility

All employees and workers have a duty in law to act responsibly and to take reasonable care for the health and safety at work of both themselves and their colleagues. This duty can be carried out by:

- Working safely and efficiently;
- Using any protective equipment provided and meeting statutory obligations;
- Reporting incidents that have led to injury or damage;
- All such incidents must be recorded and copied to the Incident Journal using the internal report form.
- Any failure to adhere to the Company Health and Safety Policy and Procedures will be considered a serious disciplinary offence and is one which may lead to dismissal; and
- Adhering to the Company procedures for securing a safe workplace. Individuals will be nominated to undertake health and safety duties as required.

Accidents

The Company is obliged by law to keep records showing details of all accidents, which occur on the premises. Therefore all accidents, however minor, to both employees and customers must be reported immediately. If any accidents are serious to warrant hospital treatment these must also be reported to the local authority. A RIDDOR form must be completed.

Security

If you are responsible for setting the alarm, failure to set the alarm may result in disciplinary action being taken.

Fire & Emergency

You must observe the evacuation procedures laid down in the event of a fire or any other emergency situation. You must be aware of the location of the emergency exits, assembly points and first aid kit. Procedures to be carried out in the event of a fire or emergency will be found on the notice boards displayed on the 4th, 6th and 7th floors.

Business Continuity & Disaster Recovery Plan

Goodman Masson operates a robust and logistical business continuity plan which focuses on recovering and restoring partially or completely interrupted critical functions within an acceptable recovery time. At all times the business continuity plan ensures clear and open lines of communication to clients, candidates and employees.

The Senior Management Team of the business operates as the emergency management team and have received in depth training on our business continuity plan.

Once we implement our Business Continuity Plan, for A) a 2 day system failure, B) payroll failure or C) shutdown of one month, the Account Manager will contact the client as soon as possible to notify key contacts and Interim Recruitment of a system failure. This will be done via email and telephone. We will advise the client that we are implementing our Business Continuity Plan and will notify again once regular service is resumed.

Simultaneously we will advise all our temp workers of the failure. We will contact any candidates due for interview and will provide all parties with all contact details including mobile numbers, blackberry details etc.

At this time we will provide the anticipated resolution timeframe and will update regularly to ensure a smooth transition to and from the Business Continuity Plan. A final communication will be sent via email and telephone to notify all parties of failure resolution and to revert back to traditional method.

A) 2 Day System Failure

We use a unified email management service supplied by Mimecast Ltd who also supports companies such as De Beers and P&O Ferries. All our mail is routed through Mimecast servers which are distributed in data centres around the world. This provides us with 100% protection against the loss of our exchange server services.

We have access to our email through their failsafe webmail application which enables remote access even in the event that our in-house server is not operational. This is a fully tested email continuity solution; not only can we access new mail at all times but we have guaranteed access to all our archived mail.

All other in house systems and financial records are backed up on a daily basis and are stored and accessible off site. Our supply company has a stock of servers and hardware on site, enabling us to rebuild servers and access database through backups.

The up time for this is 4-8 hours for a server, after which senior managers will be able to remote log on to the server and communicate to employees, candidates and clients.

Our BT phone lines have business continuity protection in the event of a disruption to our phone system in the office. Within minutes of a problem the lines can be diverted to an alternative location ensuring continuous contact with our clients and candidates, these lines will be directed directly to employees' mobile phones. We anticipate that temp and interim recruitment will not be interrupted. This solution was tested when the lines were installed in July 2009, and is tested by BT on a daily basis as it is one of their core business services.

B) Payroll Failure

All payroll systems are backed up on a daily basis and stored on and off site. We use a Disaster Recovery server that is backed up every 15 minutes, and our external (international) servers can recover and become useful within 4 hours of disaster. In the event of a failure the 3rd party would email or send via post all timesheets, proof of authorisation of timesheets and calculation of payroll for all temp workers.

Our internal software Itris provides a backup service available to us as customers. In system failure we either enforce the Business Continuity Plan or use Itris who can rebuild the server within 1 day. Once received this information will be cross referenced with the bank details held on site on our recruitment database and once confirmed these payments will be manually entered onto our online bank system. Should the online bank system fail these payments can be faxed to the bank direct.

Should this failure be likely to affect temp workers they will be immediately notified by text, telephone and email, and they will be notified again once the failure is rectified. SMS messages and email are also sent to candidates confirming that payment has been made into their bank account.

C) Shutdown of One Month

In the event of an office shutdown the Chief Executive Officer will notify the emergency management team of activation of the business continuity plan and the level of severity, in this case the most severe.

The plan ensures that all key staff have remote access to offsite computers, phones, company systems and files in an office environment hosted by our infrastructure support provider. Once all key staff have access the process would ensure that the wider staff have access via an internet connection from their home or internet café and are able to communicate with clients and candidates.

All staff will be able to access the recruitment database remotely and continue to engage with candidates and clients in the recruitment process. Power failures are protected against with the use of a UPS (Uninterrupted Power Supply) which maintains power to our systems until mainline power is restored. We have experienced power failures twice in the last two years and the UPS prevented any disruption to our business operations.

Equal Opportunities & Diversity Policy

Goodman Masson Limited aims to be an equal opportunities employer, and has a policy for this purpose.

Goodman Masson follows guidance set in The Equality Act 2010.

1. General

- 1.1 Goodman Masson is committed to a policy of equal opportunities for all employees, workers and applicants and shall adhere to such a policy at all times and will review on an on-going basis on all aspects of recruitment to avoid unlawful or undesirable discrimination.

Goodman Masson will treat everyone equally irrespective of sex, sexual orientation, marital status, age, disability, race, colour, ethnic or national origin, religion, political beliefs or membership or non-membership of a Trade Union and places an obligation upon all staff to respect and act in accordance with the policy.

Goodman Masson is committed to providing training for its entire staff in equal opportunities practice.

- 1.2 Goodman Masson shall not discriminate unlawfully when deciding which candidate/temporary worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for temporary workers.

Goodman Masson will ensure that each candidate is assessed only in accordance with the candidate's merits, qualification and ability to perform the relevant duties required by the particular vacancy.

- 1.3 Goodman Masson will not accept instructions from clients that indicate an intention to discriminate unlawfully.
- 1.4 This policy covers all aspects of employment, from vacancy advertising, selection recruitment and training to conditions of service and reasons for termination of employment.
- 1.5 Ongoing monitoring and regular analysis of such records provides the basis for appropriate action to eliminate unlawful direct and indirect discrimination and promote equality of opportunity.

Goodman Masson Limited's long term aim is that the composition of our workforce should reflect that of the community.

Where necessary, special steps as permitted by the relevant Acts of Parliament, will be taken to help disadvantaged and/ or underrepresented groups to compete for jobs on a genuine basis of equality.

2. Vacancy advertising

- 2.1. Wherever possible, all vacancies will be advertised simultaneously internally and externally. Steps will be taken to ensure that knowledge of vacancies reaches underrepresented groups internally and externally.
- 2.2. All vacancy advertisements will include an appropriate short statement on equal opportunity.

Selection and Recruitment

- 2.3. Selection criteria (job description and employee specification) will be kept under constant review to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.
- 2.4. Wherever possible, more than one person must be involved in the selection interview and recruitment process, and all should have received training in equal opportunities.
- 2.5. Reasons for selection and rejection of applicants for vacancies must be recorded.

3. Positive action - training, promotion and conditions of service

- 3.1. Under-represented groups will be encouraged to apply for training and employment opportunities with the company/etc. Wherever possible, special training will be provided for such groups to prepare them to compete on genuinely equal terms for jobs and promotion. However, actual recruitment to all jobs will be strictly on merit.
- 3.2. Wherever possible, efforts will be made to identify and remove unnecessary/unjustifiable barriers and provide appropriate facilities and conditions of service to meet the special needs of disadvantaged and/or under-represented groups.

4. Personnel Records

- 4.1. In order to ensure the effective operation of the equal opportunity policy (and for no other purpose) a record will be kept of all employees' and job applicants' age, sex, ethnic or national origins, religion/beliefs and disability.
- 4.2. Such records will be analysed regularly and appropriate follow-up action taken.

5. Sex and Race Discrimination

Unlawful sex or race discrimination occurs in the following circumstances:

5.1. Direct discrimination

Under the Equality Act 2010 direct discrimination occurs where one individual treats another individual less favourably on grounds of their sex or race than he or she treats or would treat other persons.

It is unlawful for a recruitment consultancy to discriminate against a person on the grounds of their sex, colour, race, nationality, ethnic or national origins: -

- in the terms on which the recruitment consultancy offers to provide any of its services;
- by refusing or omitting to provide any of its services;
- or in the way it provides any of its services.

Direct discrimination would also occur if a recruitment consultancy accepted and acted upon a job registration from an employer which states that certain persons are unacceptable because of their sex, colour, race, nationality, or ethnic or national origins, unless one of the exceptions applies.

5.2. Indirect Discrimination

A claim of indirect discrimination arises when an employer applies a requirement or condition generally, but which is such a proportion of persons from one racial group who can comply with it is considerably smaller than the proportion of persons not of that racial group who can comply with it.

Indirect discrimination would also occur if a recruitment consultancy accepted and acted upon an indirectly discriminatory instruction from an employer.

Goodman Masson will not discriminate unlawfully when selecting candidates or temporary workers for submission or a vacancy or assignment or in any terms of employment or terms of engagement for temporary workers.

If the vacancy falls within the definition of a genuine occupational qualification or any other statutory exception Goodman Masson will not deal further with the vacancy unless the client provides written confirmation of the genuine occupational qualification.

6. Disability Discrimination

Under the Disability Discrimination Act 1995, disability discrimination occurs if for a reason which relates to the disabled person's disability an individual:

- treats him less favourably than he treats, or would treat others to whom that reason does not or would not apply; and
- the employer cannot show that the treatment in question is justified.

Goodman Masson will not discriminate against a disabled job applicant or employee on the grounds of disability:

- in the arrangements i.e. application form, interview and arrangements for selection for determining to whom a job should be offered; or
- in the terms on which employment or engagement of temporary workers is offered; or
- by refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability; or

- in the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or
- deliberately not affording him or her any such opportunity; or
- by subjecting him or her to any other detriment (detriment will include refusal of training, transfer, demotion, reduction of wage; or harassment).

Goodman Masson will accordingly make career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of staff, candidates and clients.

Wherever possible Goodman Masson will make reasonable adjustments to hallways, passages and doors in order to provide and improve means of access for disabled employees and workers. However, this may not always be feasible.

7. Age Discrimination

Under the Equality Act 2010 and Employment Equality (Age) Regulations 2006, Goodman Masson will encourage clients not to include any age criteria or other subjective criteria in job specifications and every attempt will be made to persuade clients to recruit on the basis of competence and skill and not age.

Goodman Masson is committed to recruiting and retaining employees whose skills, experience, and attitude are appropriate to the requirements of the various positions regardless of age.

Goodman Masson will request age as part of its recruitment process but information will not be used in any detrimental way and is for compilation of personal data, which the company holds on all employees and workers.

8. Complaints and Monitoring Procedures

Goodman Masson has in place procedures for dealing with complaints of discrimination. These are available from the HR Department and will be made available immediately upon request.

Goodman Masson Recruitment Services Limited is committed to equal opportunity employment. We recognise that it is our legal duty to provide services and employment opportunities fairly and without discrimination. To ensure that this policy continues to be effective it is necessary that we monitor all candidates placed by us.

9. Part-time Workers

This Equal Opportunities Policy also covers the treatment of those employees and workers who work on a part-time basis. Goodman Masson recognises that it is an essential part of this policy that part time employees are treated on the same terms as full time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity leave, parental and domestic incident leave and access to the Goodman Masson's pension scheme. Goodman Masson also recognises that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

10. Harassment Policy

10.1. Please refer to our separate Harassment Policy.

11. Gender Reassignment Policy

11.1. Goodman Masson recognises that any employee or worker may wish to change their gender during the course of their employment with the Company.

Goodman Masson will support any employee or worker through the reassignment provided that full medical counselling has been undertaken and Goodman Masson has access to any relevant medical reports.

CSR & Environmental Policy

Goodman Masson is primarily engaged in the professional recruitment industry and provides a business service to clients on a consultancy basis. The Company is a single site operation situated in central London. The business activities of Goodman Masson can be classed as having a very low risk and as having low environmental impact. Notwithstanding this, the company takes every step to ensure that where possible risk to staff and environmental effects are reduced through the following courses of action:

- All internal procedures are developed and maintained with consideration as to any potential health, safety or environmental impact.
- Goodman Masson complies with all relevant Local or National Government environmental legislation, regulations, standards and codes of practice.
- Every possible attempt is made to reduce the consumption of energy, water, paper and consumable items used in the course of business.
- Where possible all externally sourced items are recyclable or designed to have minimum impact on the community.
- Goodman Masson encourages all employees to take an active interest in the environmental performance of the company and its Corporate Social Responsibility.
- Every possible attempt is made to account for and reduce health and safety risk.
- Goodman Masson has internally appointed officers who are responsible for aspects of health and safety requirements such as a First Aid Officer and Fire Warden.
- Our offices are sign posted to assist evacuation and safety during an event such as a fire.
- Goodman Masson operates ongoing training for all staff in relation to these issues.
- Our business encourages all employees to take an active interest in ensuring the health and safety of themselves and their colleagues.

Anti-Bribery Policy

The Goodman Masson Ethical Business Conduct Committee is tasked with monitoring the following: Consultant Conduct, Business Ethics, Collective Bargaining and our Anti-Bribery commitment.

1. EBCC Regarding Bribery Act 2010

- 1.1 The role of the EBCC is to investigate and ensure that no promise is made with intent to gain unlawfully. With regards to the Bribery Act 2010 we revert to guidance from the EBCC to determine how Goodman Masson will retain its high ethical standards and protect its reputation against any allegations of bribery or corruption.
- 1.2 Goodman Masson aims to comply with all guidelines and directorates issued by the Serious Fraud Office and Scotland Yard and the EBCC ensures we comply with all mandatory guidelines whilst providing advice on areas with less clarity.

2. How Goodman Masson is affected

- 2.1 There are 4 areas of new legislation. The first two are straightforward and relate to giving and receiving bribes while the third offence relates specifically to bribery of foreign public officials.
- 2.2 More importantly for Goodman Masson, the fourth offence is the failure of commercial organisations to prevent bribery. A relevant commercial organisation (such as a limited company or a partnership) will commit a criminal offence if a person associated with that organisation receives a bribe or bribes, or attempts to bribe, another person. The penalty will be an unlimited fine.
- 2.3 It is imperative that Goodman Masson maintains anti-bribery procedures and that these are followed with guidance from EBCC.

3. How Goodman Masson takes steps to prevent Bribery and Corruption

- 3.1 Risk Assessment – identifying areas of high risk within the business and ensuring that personnel are trained on how to look for and prevent acts of bribery or corruption.
- 3.2 Accurate Books and Record Keeping – Goodman Masson will need to retain its high level of record keeping and data management to be able to apply an accurate defence against any allegations of bribery or corruption.
- 3.3 Each Divisional Director will make available guidelines, principles and methodologies for the identification, mitigation and monitoring of these risks.

4. Action

- 4.1 It is imperative that all members of staff are fully trained and aware of the risks that bribery presents. This is necessary in order for us to defend the new criminal offence of 'failing to prevent bribery'. Goodman Masson will train all staff on legislation and this will be maintained.
- 4.2 It is imperative that all members of staff, management and the Board are aware of adequate procedures to mitigate risk.

5. How to Raise a Concern

- 5.1 Every staff member at Goodman Masson has the responsibility of maintaining our high internal ethical standards and our reputation out in the market.
- 5.2 Goodman Masson has clearly defined procedures for investigating fraud, misconduct and non-compliance issues and these will be followed in any investigation of this kind.
- 5.3 Goodman Masson will ensure that adequate protection is given to individuals who report suspicions of bribery.

Complaint Procedure

At Goodman Masson we seek fair, just and prompt solutions where possible to any complaints and appeals. Every client account is overseen by a dedicated Account Manager and Account Director. Both these individuals have contact with the client as part of the account audit and review processes.

Our priority in the case of any complaint is always to provide a seamless service to the client and our policy is to initially resolve any complaint for the client before trying to establish any fault.

If you need to raise a complaint, please contact your Account Manager through email, phone or via post. Your Account Manager will acknowledge the complaint will be made within 24 hours.

If a satisfactory resolution to any complaint or query is not achieved within 24 hours, the issue will be brought to the attention the Account Director.

If required both the members will visit you on site within 24 hours of the complaint being brought to them. In the unlikely event that Goodman Masson cannot resolve any issue then independent outside arbitration will be sought.

Our business aims to work alongside clients to respond and resolve any complaints or claims internally before any external action is taken.

Modern Slavery & Human Trafficking Statement

1. Introduction

Goodman Masson Limited recognises that all companies have a responsibility to prevent Modern Slavery & Human Trafficking within their businesses. Our organisation recruits professionally qualified accountants and other financial professionals across multiple verticals. These covers Commerce & Industry, Banking & Financial Services, Professional Services and Public Sector markets.

2. Our Policy on Modern Slavery & Human Trafficking

We are committed to ensuring that we take all reasonable measures to prevent Modern Slavery & Human Trafficking within our business. Goodman Masson believe in acting with integrity and ensuring that our systems are effective in identifying any potential risks. Our business also places significant importance on working with clients who recognise their responsibilities towards eliminating this issue.

3. Due Diligence Process for Modern Slavery & Human Trafficking

Our business carries out strict compliance checks for all candidates. We ensure verification of the identity of every worker and their right to work. By undertaking due diligence checks, we ensure compliance with the relevant legislations and continue to evolve our processes in line with these. Goodman Masson recognises its duty to act on any employee concerns by reporting any issues that may be raised.

4. Training

All employees working at Goodman Masson are educated on the issues relating to Modern Slavery & Human Trafficking and identifying the potential signs of this. All staff who are responsible for recruitment receive additional information in relation to our recruitment principles and are required to comply with our code of practice.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Goodman Masson Limited's Modern Slavery & Human Trafficking Statement for the financial year 2016 / 17.