

Michael Page



Supplier Code of Conduct

Our Supplier Code of Conduct

At Michael Page, we pride ourselves on being a reputable and honest business and are committed to upholding high ethical and professional standards in everything we do, consistent with our Values and Employee Code of Conduct. In turn, we recognise the important relationship between Michael Page and our suppliers in achieving high performance across our business and supporting our Purpose to 'Changes Lives'.

We consider our suppliers to be an extension of our own organisation. As such, the quality of the work you deliver and the manner in which you conduct your business directly reflects on Michael Page. It is therefore essential that our suppliers understand, support and uphold the standards we expect, which we believe are fundamental to responsible and sustainable business practices.

These standards reflect the principles that guide our own conduct and shape how we expect to engage with our suppliers, as well as how we expect to be treated in return. The Supplier Code of Conduct applies to all third parties, consultants and contractors engaged to provide goods or services to, or on behalf of, Michael Page.

This Code sets out our minimum expectations and requirements and should be regarded as a baseline standard, rather than a limit to best practice.

We therefore ask our suppliers to adhere to our Supplier Code of Conduct and to promote our standards within the supply chain. We expect our suppliers to have processes in place to support meeting these standards and shall be able to provide supporting evidence if requested. Michael Page may seek appropriate assurance from suppliers that they comply with the Supplier Code of Conduct through our procurement process and periodic review of compliance. The scope of review would be dependent on the nature and delivery of the service and may range from self-assessment through to independent audit.

Anti-Bribery and Corruption

Michael Page operates a zero-tolerance policy to bribery and corruption and endorses the work of bodies such as the Organisation for Economic Cooperation and Development (OECD) in shaping policies aimed at combatting corruption and bribery and fostering prosperity, equality, opportunity, and well-being for all.

Under no circumstances do we offer or accept bribes or improper inducements, including facilitation payments, to secure business or to gain any advantage for either the Company or for any individual. We therefore expect our suppliers to conduct business in an ethical and responsible manner, and in accordance with anti-bribery and corruption legislation in that they will not engage in, consent to, or connive in any activity, practice or conduct which would constitute an offence under such legislation (including the UK Bribery Act 2010).

We require suppliers to have in place adequate procedures to prevent any person associated with it committing an offence under such legislation, including any inducements or reward to a person for the improper performance of that person's position, or participation in any form of corrupt practice.

Gifts and Hospitality

Michael Page recognises that maintaining high quality professional relationships with suppliers is essential to the success of our business. We acknowledge that suppliers may sometimes offer business courtesies' such as reasonable entertainment and modest gifts to build goodwill, but without due care and consideration, these can be counterproductive by creating improper or an impression of creating improper influence upon our objectivity in decision making.

Suppliers must not offer gifts, hospitality, or entertainment with the intention or where it could be concluded that there may be an intention to improperly influence Michael Page employee's judgement or decision making in respect of its engagement with the supplier.

Conflicts of interest

Conflicts of interest must be avoided – they can be damaging to our business and reputation, work against the principles of ethical and fair treatment, and can contravene the law.

Suppliers must voluntarily declare any engagement between its personnel and Michael Page staff that creates or may appear to create a conflict of interest that could affect a Michael Page employee's judgement and conflict with Michael Page's interests. This shall include circumstances such as where a supplier's employee has a family or personal relationship with a Michael Page employee that may represent a perceived conflict of interest.

Anti-Competitive practices

Competition and anti-trust legislation prohibit business practices that conflict with the principles of free and fair competition and help to uphold fair and ethical business practices. Breaching competition law has serious consequences including fines of up to 10% of global turnover and criminal prosecution of individuals. Cartel behaviour is the most obvious form of anti-competitive behaviour and is strictly prohibited. Agreements that fix market prices or other market conditions such as discounts, commissions, or rebates, or that limit or share control of markets or technical development and/or sources of supply are equally unacceptable.

Michael Page is committed to fair, free, and open competition, and strictly prohibits suppliers from engaging in anti-competitive practices. If you have reason to suspect anti-competitive activities, you should report it via the Speak Up process.

Our People

Workplace and personal safety

Suppliers must adhere to all the relevant health and safety legislation and standards in all countries of operation and in consideration of the services being provided. They shall actively ensure that they operate a safe working environment for all employees, visitors and other persons affected by their activities, and that suitable and sufficient health and safety policies and procedures are in place and communicated to staff as required.

Appropriate training on health and safety matters must be provided to supplier employees, including relevant refresher training as required. Suppliers, including any sub-contracted suppliers, must adhere to relevant Michael Page health and safety regulations when engaged in activities at any of our locations. Suppliers must have a process in place to allow employees to report any health and safety issues without fear of intimidation as well as a process to track and manage such reports.

Diversity, Equality, and Inclusion

We promote a diverse, inclusive, and equal workplace both internally and externally. Every employee is expected to treat everyone with whom we have contact with dignity, courtesy, and respect. At Michael Page we believe staff employed by our suppliers, whether permanent or temporary, should have the same basic rights to be treated with respect and dignity at work as our own employees. There should be no discrimination based on race, colour, ethnic or national origins, marital status, family circumstances, age, disability, sexual orientation, gender identity, political or religious belief, union membership or political affiliation.

Harassment-free workplace

Every Michael Page employee has the right to a working environment free from harassment and intimidation. We recognise that being a global firm means operating in many countries with differing laws. We are sensitive to these and to cultural and social differences. However, our principles are universal and are reflective of the laws of every country in which we operate. We have a zero-tolerance approach to all forms of harassment, sexual harassment, and victimisation and we are committed to ensuring that all reasonable steps are taken to prevent harassment by third parties.

What constitutes harassment? Harassment is unwanted conduct which has the purpose or effect of violating an individual's dignity and/or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

We expect our suppliers to treat their own employees with integrity and respect and to ensure they adopt a zero-tolerance approach to all forms of harassment, sexual harassment, and victimisation. We also expect that our suppliers are committed to ensuring that all reasonable steps are taken to prevent harassment, and this shall include instituting policies and appropriate procedures aimed at protecting their employees from all forms of harassment.

Human rights

Suppliers must have in place policies and processes recognising, respecting, and protecting the human rights of their employees, supply chain, stakeholders, and communities within which they operate. We're committed to preventing acts of modern slavery and human trafficking from occurring within our business and our supply chain, and where applicable expect suppliers to comply with the Modern Slavery Act 2015. Michael Page's Annual **[Modern Slavery Policy Statement can be found here.](#)**

Our People

Michael Page is a signatory of the United Nations Global Compact and respects and supports all its principles, including those regarding human rights and labour. In our efforts to respect and uphold internationally recognised human rights, we are guided by international norms and standards including:

- International Bill of Human Rights
- International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprise

We expect the people employed by our suppliers, whether permanent or temporary, to have the same basic right to be treated with respect and dignity at work as our own employees. Child labour must not be used and the policies and procedures relating to the employment of children should conform to the relevant International Labour Organisation standards. We believe employment should be chosen; there must be no forced, bonded, or involuntary labour. Supplier employees must not be required to lodge monies or identity papers to work and must be free to leave employment after giving reasonable notice.

Further, supplier employees must have access to relevant training and personal development and be freely allowed to associate with others, form and join (or refrain from joining) organisations of their choice and bargain collectively without interference. Wherever possible work performed should be on the basis of a recognised employment agreement as defined by national law and practice. Suppliers must follow all applicable laws and regulations with respect to working hours and days of rest. Overtime must be voluntary and paid. Suppliers should also ensure that all employees receive at least the legally mandated minimum wage and benefits for the country in which they are employed.

Environmental, Social and Governance (ESG) – Supply chain management

We believe that developing a sustainable business is not only the best way to help look after our environment, but also contributes to delivering a successful and ethical company. We expect our suppliers to operate in a sustainable and socially responsible manner and support our commitment in reducing our impact on the environment. This should be under an appropriate Environmental policy and management system and in accordance with applicable local and national laws and regulations relating to the protection of the environment. In addition, Michael Page expects our suppliers to:

1. Have undertaken a sustainability assessment via the EcoVadis platform (or equivalent independent sustainability assessment) or have an environmental policy or accreditation such as ISO14001.
2. Undertake appropriate due diligence activities across its own supply chain to ensure its subcontractors & partners also exhibit a similar high commitment to sustainability across its operations.
3. Design and develop products considering the impact they have on the environment and the potential to reuse and recycle them.
4. Make every effort to optimise the use of resources and minimize polluting/greenhouse gas (GHG) emissions – ideally via reduction goals validated by Science Based Targets Initiative (SBTi)
5. Share environmental data such as waste/emissions of the supplier and/or products & services provided to Michael Page as reasonably requested.

We seek continuous improvement in the reduction of our adverse impact on the environment and expect our suppliers to support efficiency programmes and opportunities to help meet this aim. This includes the reduction in consumption of non-renewable energy forms and the encouragement of recycling where possible. Suppliers must be willing to reasonably co-operate with Michael Page in the drafting, preparation, commissioning, and operation of sustainable processes and be willing to provide reasonable data concerning the environmental impact of the provision of their goods and services to Michael Page so that we can use such data as it deems appropriate.

Our Integrity

Financial integrity

We expect our suppliers and their staff to act with integrity and honesty. In doing so, we expect our suppliers and their staff to not seek to gain advantage by acting in a fraudulent manner, whether that be by deceiving someone or acting dishonestly. This shall include, but not limited to money laundering, misreporting of time, expenses or third-party supplier costs, tax evasion or misappropriation of property.

Confidential information

Information is one of our most valuable assets that we depend on to function effectively and we should protect it. Information could be in many forms from email, databases, and voicemail, as well as paperbased communication, photos, and videos.

As a supplier to Michael Page, you may obtain confidential information from your interactions with our employees, systems, or other suppliers to the company. We expect our suppliers to handle, keep, transmit, and process confidential information safely and securely and only for the purposes permitted under its contract with Michael Page. Suppliers must not disclose Michael Page information to third parties unless permitted under its contract with Michael Page. Please also refer to Michael Page's Information Security policy here for further detail on how we expect our suppliers to store, handle and process our data.

Data Protection and Information Security

As part of the services you provide to us, you are likely to process the personal data of Michael Page's clients, candidates, and employees. Where this is the case, we expect that you will respect individuals' rights to privacy and process personal data in compliance with all applicable data protection and information security laws, and in accordance with accepted industry standards and our instructions. All of our suppliers are required to (a) treat personal data as strictly confidential, (b) not use it for any purposes other than to provide services to us, and (c) implement and maintain appropriate technical and organisational security measures to protect personal data against loss, unauthorised access, destruction, use, modification and disclosure.

For further information on how we expect our suppliers to process and secure personal data, please read our **[data protection policy and information security policy here](#)**.

Compliance and Speak Up

Michael Page may amend the Supplier Code of Conduct from time to time, with the latest version being available via the Michael Page **[Investor relations website here](#)**. If you have any questions concerning Michael Page's Supplier Code of Conduct, please contact the Group Procurement & Vendor Management team via: vendor.management@page.com

Michael Page reserves the right to have access to a supplier's premises and records with reasonable notice to ensure compliance with this Code of Conduct and take appropriate remedial actions where appropriate.

Michael Page is committed to high standards of professionalism and integrity. It is important to us that any wrongdoing relating to our activities is reported and dealt with properly. That's why we encourage anyone who works with us to Speak Up if they see or hear something that doesn't feel right.

Full details on our Speak Up policy, including details on how you can raise a concern anonymously is **[available here](#)**.