



BWD Search & Selection Ltd - Corporate Social Responsibility (CSR) Policy

At BWD we realise that our actions have an impact on our people, clients, candidates and the community. We strive to be a responsible employer and are committed to supporting the wider community and environment as best we can.

As an Employer

We aim to be an employer of choice. We believe that our employees are our greatest asset and strive to offer them opportunities to develop and fulfil their potential in a supportive environment.

As an employer we:

- Provide employee benefits beyond the minimum legislative requirements including death in service benefits of 4 x annual salary, a generous annual holiday entitlement, and competitive salaries with one of the industry's leading bonus systems. We are currently introducing a company contributory pension scheme so that we can help our employees build pensionable benefits for the future. In addition, we financially support our employees through long term sickness / maternity periods
- Provide additional benefits such as all-inclusive holidays to luxurious destinations including St Lucia and Barbados for employees who achieve certain levels of business production. In addition, we offer our employees the opportunity to win travel breaks on the Orient Express shopping trips to New York and a week in the Rockies.
- 'Cycle to work Scheme' – We have recently become members of this scheme promoted by the Department for Transport in order to reduce the carbon omissions from our employee's vehicles and also to encourage a healthy workforce.
- BWD is an equal opportunities employer. We regard diversity as a key value and are committed to diversity in our dealings with employees, candidates and customers. Our Equal Opportunities Policy is attached at **Annex 1.**

Health and Safety

- We have a health and safety policy which is embedded into our operations. This ensures we provide proper control of all health and safety risks within the organisation and that the safety of our employees, contractors, clients, candidates and visitors is paramount for the Company. Our Health and Safety Policy is attached at **Annex 2.**
- The Company provides appropriate risk assessments and all staff are aware of our Health and Safety Policy and their obligations. Contractors and temporary staff are also made aware of their obligation to comply with Health and Safety requirements.

Clients

We view both our clients and our employees as our most important assets. Meeting their requirements is paramount to our aims as a Company. We are a responsible supplier and aim to 'go the extra mile' in meeting our clients' goals.

We are constantly looking for ways to add value to our clients by giving real value for money. This includes:

- Increasing rebate periods;
- Reduced payment terms for candidates sourced from job boards;
- Part payments for certain clients in order to help their cash flow;
- Operating free salary surveys to our valued clients;
- Only charging our clients once a placement has been secured - no placement no fee; and
- Consultants who offer independent advice to our clients concerning their recruitment strategy.

Client Charter:

As a financial services recruitment consultancy we aim to provide the highest possible level of service to all of our clients. In order for our clients to have absolute faith in the service we provide, we will:

- always be friendly and helpful when they speak with us
- seek to understand their business and listen to their recruitment requirements
- treat the information they provide with the utmost confidentiality
- look to add value to their business throughout their dealings with us
- act in a professional and ethical manner
- strive to source the best possible candidates by utilising a variety of proactive recruitment techniques
- remain accountable throughout the recruitment process
- listen to their views with the aim of improving the service we provide

We have a complaints policy and procedure which is attached at **Annex 3**.

Recruitment & Employment Confederation (REC)

We strive to uphold the highest level of integrity as a recruitment company. To this end BWD is a corporate member of the Recruitment and Employers Confederation and observes the REC's codes of practice in all its operations:

- | | |
|------------------------------|--|
| - Honesty | - Transparency |
| - Respect of confidentiality | - A commitment to professional development |

Candidates

As a financial services recruitment consultancy we aim to provide the best possible service to all of our candidates. In order for our candidates to have complete faith in the service we offer we will:

- allocate them a specific consultant who will co-ordinate all approaches on their behalf
- always be friendly and helpful when they speak with us
- listen closely to their requirements before making any recommendations to them
- respect the confidentiality of the information they provide at all times
- construct a CV on their behalf in order to introduce them to one of our clients, where applicable
- never discriminate because of race, religion, sex or age
- represent them in an independent capacity seeking to source them the most suitable placement
- never send out their details to a client without their express permission
- prepare them for all interviews and assessments to the best of our ability
- negotiate any offer on their behalf to secure the best possible package for them
- recommend other reputable recruitment consultancies / job boards, if we are unable to place them

Data Protection

We comply with the relevant principles governing data protection in all our dealings with candidates, clients and employees.

As a member of the Wider Community

BWD recognises its role in supporting the wider community and encourages links between our offices in Leeds and Hemel and their local areas. In particular:

- We support employees who wish to take part in sponsored activities for the community.
- Whenever we can we source products and services locally, supporting the community and the environment. This includes local office furniture suppliers, garages for our employee's vehicles, catering businesses and cleaning companies.
- We support the Leeds division of the NSPCC with regular donations each quarter.

The Environment

We aim to minimise the impact of our carbon footprint at all times. In particular:

- We have recently joined the 'cycle to work scheme' for our employees;
- We use low energy light bulbs within our office;
- We have recycle bins for paper and plastic bottles in order to keep our waste to a minimum;
- We buy Fair Trade coffee, tea and sugar;
- We ensure that PCs / lights are turned off when people leave at the end of the day;
- We utilise local suppliers and businesses where possible;
- We have a policy of not driving or flying to client meetings where possible and to encourage all our staff to use the train.
- We are working towards being a 'Carbon Neutral' business by planting trees to offset our carbon emissions. Trees absorb carbon dioxide to produce oxygen, provide wildlife habitats and enhance the natural UK landscape

Ongoing Commitment

We are committed to regularly reviewing our CSR commitments, recognising that there is always more that can be done. We are not complacent and, as we grow, we will be taking steps to increase our contribution in all these areas and beyond.

Annex 1

Equal Opportunities Policy

1. GENERAL

1.1 BWD Search & Selection Ltd 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 all aspects of recruitment to avoid unlawful or undesirable discrimination. BWD Search & Selection Ltd will treat everyone equally irrespective of sex, sexual orientation, gender reassignment, marital or civil partnership status, age, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs or membership or non-membership of a Trade Union or spent convictions, and places an obligation upon all staff to respect and act in accordance with the policy. BWD Search & Selection Ltd is committed to providing training for all its staff in equal opportunities practice.

1.2 BWD Search & Selection Ltd 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. BWD Search & Selection Ltd will ensure that each candidate is assessed only in accordance with the candidate's merits, qualifications and ability to perform the relevant duties required by the particular vacancy.

1.3 BWD Search & Selection Ltd will not accept instructions from clients that indicate an intention to discriminate unlawfully.

2. DISCRIMINATION

Unlawful discrimination occurs in the following circumstances:

2.1. Direct discrimination

Direct discrimination occurs where one individual treats or would treat another individual less favourably on grounds of sex, sexual orientation, gender reassignment, marital or civil partnership status, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs ("the protected categories").

It is unlawful for a recruitment consultancy to discriminate against a person on the grounds that they are members of a protected category.-

- in the terms on which the recruitment consultancy offers to provide any of its services;
- by refusing or deliberately omitting to provide any of its services;
- 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 they are members of a protected category, unless one of the exceptions applies, for instance, the job demands a genuine occupational requirement.

2.2. Indirect Discrimination

A claim of indirect discrimination arises when an employer applies a provision, criterion or practice generally, but which is such that a proportion of persons in a protected category who can comply with it is considerably smaller than the proportion of persons who are not in that protected category.

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

If the vacancy falls within the definition of a genuine occupational requirement or any other statutory exception BWD Search & Selection Ltd will not deal further with the vacancy unless the client provides written confirmation of the genuine occupational requirement

3. DISABLED PERSONS

3.1 Direct Discrimination

Direct discrimination against a disabled person occurs where, if for a reason which relates to the 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;

Or

- If on the ground of a disabled person's disability, he treats the disabled person less favourably than he treats or would treat a person not having that particular disability, whose relevant circumstances, including his abilities, are the same as, or not materially different from, those of the disabled person. This type of direct discrimination can never be justified.

3.2 Duty to make reasonable adjustments and to provide auxiliary aids and services

This is a similar protection to indirect discrimination in the other protected categories.

Where a provision, criterion or practice applied by or on behalf of an employer, or any physical feature of the employer's premises, places a disabled person at a substantial disadvantage in comparison with persons who are not disabled, it will be the duty of an employer to take such steps as are reasonable, in all the circumstances of the case, to remove the provision, criterion, practice or physical feature.

Agencies must take reasonable steps to provide auxiliary aids or services if this would make it easier for the disabled person to use their services. For instance, an appropriate auxiliary aid or service can include the provision of information on audiotape or provision of a sign language interpreter.

BWD Search & Selection Ltd 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).

BWD Search & Selection Ltd 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 BWD Search & Selection Ltd 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.

3. AGE DISCRIMINATION

Although age discrimination is not expected to become unlawful until October 2006 (isn't it now unlawful?), BWD Search & Selection Ltd 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.

BWD Search & Selection Ltd is committed to recruiting and retaining employees whose skills, experience, and attitude are appropriate to the requirements of the various positions regardless of age.

As far as is reasonably possible, no age requirements will be stated in any job advertisements on behalf of the Company.

BWD Search & Selection Ltd will request age as part of its recruitment process but information will not be used as selection, training or promotion criteria or in any detrimental way and is only for compilation of personal data, which the Company holds on all employees and workers.

4. PART-TIME WORKERS

This Equal Opportunities Policy also covers the treatment of those employees and workers who work on a part-time basis. BWD Search & Selection Ltd 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 BWD Search & Selection Ltd pension scheme. BWD Search & Selection Ltd also recognises that part-time employees must be treated the same as full-time employees in relation to training and redundancy situations.

5. HARASSMENT

5.1 BWD Search & Selection Ltd is committed to providing a work environment free from unlawful harassment.

5.2 Harassment on grounds of sex, sexual orientation, gender reassignment, marital or civil partnership status, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs or any other basis protected by legislation is unlawful and will not be tolerated by BWD Search & Selection Ltd

5.3 This policy prohibits unlawful harassment by any employee or worker of the [Recruitment Company].

5.4 Examples of prohibited harassment are:-

- 5.4.1 Verbal or written conduct containing derogatory jokes or comments,
- 5.4.2 Slurs or unwanted sexual advances,
- 5.4.3 Visual conduct such as derogatory or sexually orientated posters,
- 5.4.4 Photographs, cartoons, drawings or gestures,
- 5.4.5 Physical conduct such as assault, unwanted touching, or any interference because of sex, race or any other protected basis,
- 5.4.6 Threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours,
- 5.4.7 Retaliation for having reported or threatened to report harassment.

5.5 If you believe that you have been unlawfully harassed, you should make an immediate report to Alistair Brownlee followed by a written complaint as soon as possible after the incident. Your complaint should include:

- Details of the incident
- The name or names of the individual or individuals involved
- The name or names of any witness or witnesses

5.6 BWD Search & Selection Ltd will undertake a thorough investigation of the allegations. If it is concluded that unlawful harassment has occurred, remedial action will be taken.

5.7 Any employee who BWD Search & Selection Ltd finds to be responsible for unlawful harassment will be subject to the disciplinary procedure and any sanction may include termination. [A person who discriminates or harasses may be liable for payment of damages to the person offended, in addition to any damages payable by BWD Search & Selection Ltd should it have been found to have failed to ensure the practice ceased forthwith. Under the Criminal Justice Act 1994, harassment became a criminal offence, punishable by a fine of up to £5,000 and/or a prison term of up to 6 months. Under the Protection from Harassment Act 1997, the penalties for aggravated harassment are an unlimited fine and/or 5 years imprisonment.]

6. GENDER REASSIGNMENT

- 6.1 BWD Search & Selection Ltd recognises that any employee or worker may wish to change their gender during the course of their employment with the Company.
- 6.2 BWD Search & Selection Ltd will support any employee or worker through the reassignment provided that full medical counseling has been undertaken and BWD Search & Selection Ltd has access to any relevant medical reports.
- 6.3 BWD Search & Selection Ltd will make every effort to try and protect an employee or worker who has undergone, is undergoing or intends to undergo gender reassignment, from discrimination or harassment within the workplace.
- 6.4 All employees and workers will be expected to comply with BWD Search & Selection Ltd's policy on harassment in the workplace. Any breach of such a policy will lead to the appropriate disciplinary sanction.
- 6.5 Where an employee is engaged in work where the gender change imposes genuine problems BWD Search & Selection Ltd will make every effort to reassign the employee or worker to an alternative role in the Company.
- 6.6 Any employee or worker suffering discrimination as the result of their gender reassignment should make recourse to the Company's grievance procedure.
- 6.7 Any discrimination complaint will be investigated fully.

7. COMPLAINTS AND MONITORING PROCEDURES

BWD Search & Selection Ltd has in place procedures for dealing with complaints of discrimination. These are available from Alistair Brownlee, Director, and will be made available immediately upon request.

Annex 2

BWD Search & Selection Ltd Health & Safety Policy Statement

General Statement of Policy

Company Policy

It is the policy of the Company to provide and maintain safe and health working conditions, equipment and systems of work for all our 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 aims of the Company.

The Company 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;
- Maintaining all places of work in a safe condition;
- 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 lead to injury or damage;
- Adhering to the Company procedures for securing a safe workplace. Individuals will be nominated to undertake health and safety duties as required.
- All such incidents must be recorded and copied 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.

Accidents

The Company is obliged by law to keep a record 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 board.

Further details of our health & safety policy are available upon request

Annex 3

COMPLAINTS POLICY AND PROCEDURE

Complaints Policy

BWD Search & Selection Ltd is committed to providing a high level service to our customers. If you do not receive satisfaction from us we need you to tell us about it. This will help us to improve our standards.

Complaints Procedure

If you have a complaint, please contact James Walker, Director. You can write to him at:
BWD Search & Selection Ltd, Unit 3, Woodside Mews, Clayton Wood Close, Leeds, LS16 6QE.

Next steps

1. We will send you a letter acknowledging your complaint and asking you to confirm or explain the details set out. We will also let you know the name of the person who will be dealing with your complaint. You can expect to receive our letter within 5 working? days of us receiving your complaint.
2. We will record your complaint in our central register within a day of having received it.
3. We will acknowledge your reply to our acknowledgment letter and confirm what will happen next. You can expect to receive our acknowledgement letter within 5? days of your reply.
4. We will then start to investigate your complaint. This will normally involve the following steps;
 - We may ask the member of staff who dealt with you to reply to your complaint within 5 days of our request;
 - We will then examine the member of staff's reply and the information you have provided for us. If necessary we may ask you to speak to them. This will take up to 4 days from receiving their reply.
5. James Walker will then invite you to meet him to discuss and hopefully resolve your complaint. He will do this within [5] days of the end of our investigation.
6. Within 2 days of the meeting James Walker will write to you to confirm what took place and any solutions he has agreed with you.

If you do not want a meeting or it is not possible, James Walker will send you a detailed reply to your complaint. This will include his suggestions for resolving the matter. He will do this within 5 days of completing his investigation.
7. At this stage, if you are still not satisfied you can write to us again. Another Director of the Company will review James's decision within 10 days.
8. We will let you know of the outcome of this review within 5 days of the end of the review. We will write to you confirming our final position on your complaint and explaining our

reasons. If you are still not satisfied, you can contact the Employment Agencies Standards Office at the Department of Trade and Industry or the REC, the industry trade association, of which we are a member, by writing to the Professional Standards Manager, REC, 36-38 Mortimer Street, London W1W 7RG.

If we have to change any of the time scales above, we will let you know and explain why.