

Supplier Code of Conduct



1. Introduction

As a UK-based Recruitment Agency, Xander Recruitment Group Ltd is committed to maintaining the highest standards of ethics, integrity, and professionalism. This Supplier Code of Conduct outlines the expectations and requirements for all supply companies that wish to partner with us and supply high-quality, vetted, compliant, services and legal agency workers to our shared clients. By signing this Code, suppliers agree to uphold the principles outlined below and actively contribute to safeguarding workers' rights and wellbeing. You also agree to be audited in due course against some of the items outlined and others. There will be other legal agreements that will need to be entered into to supply staff and services in line with Xander Recruitment Groups processes.

2. Compliance with Laws and Regulations

Suppliers are required to comply with all applicable UK laws, regulations, and industry standards pertaining to their operations and the provision of agency workers. This comprehensive compliance extends to their own supply chain and includes, but is not limited to:

- Labour, employment, and health & safety legislation
- Immigration and right-to-work checks
- Anti-discrimination laws
- Modern Slavery Act 2015 and related transparency requirements
- Data protection laws (UK Data Protection Act 2018 and General Data Protection Regulation - GDPR)

Suppliers must be able to demonstrate their compliance upon request and immediately notify Xander Recruitment Group of any instances of non-compliance, legal violations, or investigations relevant to these areas. Failure to meet these legal obligations constitutes a material breach of this Code.

3. Ethical Recruitment Practices

Suppliers are required to uphold the highest ethical standards in all recruitment activities and must prioritise the welfare and rights of all candidates. This includes:

- Implementing fair, objective, and transparent recruitment processes that are free from discrimination and unconscious bias, ensuring all candidates receive clear, consistent information about roles and expectations.
- Absolutely prohibiting the charging of any fees, charges, or deductions to candidates for recruitment, placement, or related services.
- Ensuring rigorous and lawful verification of all candidate documentation (e.g., right-to-work, qualifications, professional registrations) and facilitating thorough, compliant, and supportive onboarding experience for all placed workers.
- Safeguarding the confidentiality and privacy of candidate personal data in full compliance with the UK Data Protection Act 2018 and the General Data Protection Regulation (GDPR).
- Adhering to strict ethical and legal standards for all international recruitment, including but not limited to the active prohibition of recruitment from designated "red list" countries (unless a government-to-government agreement is in place). Suppliers must take all necessary steps to prevent

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and identify indicators of modern slavery, forced labour, debt bondage, or any other form of worker exploitation throughout the recruitment and placement lifecycle.

4. Labour and Human Rights

Xander Recruitment Group maintains a zero-tolerance policy towards modern slavery and expects suppliers to:

- Prohibit all forms of child labour, forced labour, bonded labour, and human trafficking
- Guarantee that all employment is freely chosen
- Provide safe, fair, and lawful working conditions
- Actively monitor for signs of exploitation or abuse in recruitment and placement
- Promptly report any actual or suspected incidents of modern slavery that have occurred within your organisation or supply chain in the past 12 months. Suppliers are required to proactively notify Xander Recruitment Group as soon as reasonably practicable upon identifying such incidents. Under no circumstances should this information be withheld, delayed, or obscured. Full transparency is expected to ensure timely and appropriate action.

5. Modern Slavery Risk Management

Suppliers must take proactive steps to manage modern slavery risk through:

- Due diligence: Risk-based vetting during onboarding and ongoing monitoring
- Contractual protections: Modern slavery clauses must be included in contracts and agreements
- Ongoing oversight: Modern slavery considerations should form part of in-life contract management

6. Visa Sponsored Workers

Xander Recruitment Group Ltd is committed to safeguarding the rights and welfare of all visa-sponsored workers. Suppliers, and their partners involved in their recruitment and placement, must therefore:

- Rigorously monitor all working hours to ensure compliance with UK Working Time Regulations. For any supplementary employment, strict adherence to the statutory 20-hour weekly limit for visa-sponsored workers is mandatory
- Actively prevent all forms of unlawful deductions, coercion, or exploitation of visa holders. This involves, but is not limited to; Charging of recruitment fees, visa application fees, or associated administrative costs to candidates, whether directly or indirectly, throughout the recruitment and employment lifecycle
- Ensuring that any payroll deductions are strictly legal, clearly agreed upon in writing, and do not reduce the worker's net pay below the minimum wage or their sponsored salary threshold
- Protecting workers from debt bondage, abusive loan arrangements, or the unlawful retention of their identity documents

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- Establish and maintain robust internal controls and due diligence processes to systematically identify, assess, and mitigate risks specifically associated with visa arrangements and international recruitment pipelines
- Fully cooperate with Xander Recruitment Group's initiatives to protect migrant and international workers, including responding to information requests, participating in compliance reviews, and collaborating on best practices
- Provide comprehensive and accurate information to workers about their terms of employment, rights, visa conditions, and legal protections before they leave their home country, ensuring they are fully informed and prepared
- Have clear channels for workers to raise grievances or concerns without fear of reprisal, and processes for addressing these promptly and effectively.

7. Grievance Mechanisms and Worker Voice

Suppliers must:

- Ensure all workers have access to clear, confidential, and accessible grievance mechanisms
- Confirm that these mechanisms exist within their own operations and any partner agencies
- Ensure workers can raise concerns without fear of retaliation or negative consequences

8. Anti-Bribery and Corruption

Suppliers must:

- Operate under a strict zero-tolerance policy for bribery, corruption, or fraudulent behaviour
- Refrain from offering or accepting any inducement that could improperly influence business decisions

9. Confidentiality and Data Protection

Suppliers must:

- Comply with all relevant data protection legislation
- Protect personal, commercial, and confidential information entrusted to them
- Limit access to sensitive data to authorised personnel only

10. Conflict of interest

Suppliers must:

- Disclose any actual or potential conflicts of interest that may affect their impartiality
- Avoid relationships or actions that could compromise their independence or that of Xander Recruitment Group

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11. Environmental Responsibility

Suppliers are encouraged to:

- Minimise environmental impact in their operations
- Comply with all relevant environmental laws and regulations
- Adopt sustainable practices wherever practical

12. Quality and Performance

Suppliers must:

- Provide consistently high-quality services that meet Xander Recruitment Groups standards for speed, accuracy, candidate suitability, compliance, and responsiveness, and strictly adhere to all agreed Service Level Agreements where applicable
- Actively participate in regular performance reviews and audits conducted by Xander Recruitment Group, providing all necessary data and insights to facilitate a transparent assessment of service delivery and compliance.
- Demonstrate continuous improvement in service delivery by proactively identifying areas for enhancement, implementing corrective actions, and sharing evidence of sustained positive change
- Address any service deficiencies or non-compliance promptly and effectively through agreed corrective action plans

13. Health and Safety

Suppliers must:

- Ensure a safe and healthy working environment for all staff and workers they place
- Comply with all relevant health and safety regulations
- Promptly address any identified health or safety risks

14. Monitoring and Performance

Xander Recruitment Group maintains the right to ensure full compliance with this Code of Conduct. To this end, Xander Recruitment Group reserves the right to;

- Conduct regular, ad-hoc, or risk-based audits and assessments of supplier compliance, which may include on-site visits, remote reviews, or involvement of third-party specialists
- Request and review any relevant documentation, data, or evidence necessary to verify adherence to the Code
- Thoroughly investigate any concerns or allegations related to potential breaches of this Code, originating from internal sources, workers, or external parties

Suppliers must:

- Cooperate fully and transparently with all compliance checks, audits, assessments, and investigations, providing timely access to requested information, documentation, and personnel.

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- Promptly and effectively address all identified non-compliances or areas for improvement through the development and implementation of agreed corrective action plans.
- Acknowledge that failure to cooperate with compliance checks or to promptly rectify identified breaches may result in corrective actions, suspension, or termination of the partnership

15. Reporting and Whistleblowing

Suppliers must:

- Provide clear and accessible ways for staff and workers to report violations of this Code
- Protect whistleblowers from retaliation
- Inform Xander Recruitment Group promptly of any serious concerns or breaches

16. Consequences of Non-Compliance

Failure to comply with this Supplier Code of Conduct may result in:

- Suspension or termination of the business relationship
- Removal as an approved supplier to Xander Recruitment Group
- Reporting to appropriate regulatory authorities

17. Ongoing Commitment

Suppliers are expected to:

- Continually review and enhance ethical, legal, and operational standards
- Maintain alignment with Xander Recruitment Group values and the Modern Slavery Act 2015
- Promote accountability and transparency across their operations and partnerships

18. Acknowledgment and Acceptance

By signing below, the supplier acknowledges receipt of this Supplier Code of Conduct and agrees to comply with the expectations and requirements outlined herein.

Supplier Name: _____

Authorised Signature:

Printed Name: _____

Title: _____

Date: _____