



Conduct & Ethics



We conduct our business with high standards of ethics and integrity

Who we are

Definitive Consulting Limited and all its subsidiary companies including but not limited to:

Definitive Consulting PTY Limited, Definitive Consulting (HK) Limited, Definitive Consulting (SG) PTE, Definitive Consulting FZ LLE and DC Initiatives LLP; hereafter referred to as Definitive Consulting.

The head office is located at 33 Queen Street, London, EC4R 1AP, +44 207 0780 765.

Definitive Consulting is a leading global executive search specialist and trusted partner to professional services firms worldwide.

Our specialist practice groups work closely with a select group of leading firms in the Advisory, Assurance, Consulting, Legal and Taxation sectors.

In line with our core ideologies, we pride ourselves on conducting our business with high standards of ethics and integrity.

That does not just mean complying with the prevailing legislation and regulations. It means acting with professionalism and leading by example both internally and externally.

Our Business Code of Conduct and Ethics statement outlines the standards of behaviours and processes by which we operate.

- **Complying with Laws and Regulations:** Being a global business, we ensure we are aware of all legislation which regulates the way in which we can conduct business.

We also ensure we are accustomed with any cultural idiosyncrasies to ensure we operate in the most professional and respectful way. We cooperate with law enforcement agencies and regulators in respect of any queries they may have. As well as adhering to external regulations, we also have group policies and standards to which we are committed.

- **Promoting Diversity and Equality:** We uphold strong internal policies which outline our commitment to equality and diversity. We treat and recruit employees, partners, clients and candidates with equality, fairness and respect regardless of their gender, sex, race, colour, ethnic or national origins, marital status, family circumstances, age, disability, sexual orientation or political/religious beliefs.
- **Maintaining a Safe and Healthy Environment:** We adhere to all necessary legislation regarding occupational health and safety. We provide the necessary training to all employees and visitors to ensure their health and safety is not compromised at any time whilst inside any of the Definitive Consulting premises.
- **Supporting Environmental Sustainability:** We encourage all staff to minimise their carbon footprint in the workplace and try to ensure that as a business we promote the minimisation of energy, water and paper consumption.
- **Respecting Confidentiality:** We comply with laws, regulations and group standards governing the confidentiality of personal and corporate information. We do not disclose confidential information unless we have written authorisation to do so, or are required by law to do so.

- **Bribery and Corruption:** We do not offer or accept any bribes or improper inducements in order to secure business, or to gain any advantage for either the company or ourselves as individuals. Further to this, we do not offer or accept gifts, entertainment, or other benefits that could appear to compromise normal commercial relationships.
- **Conflicts of Interest:** As mentioned earlier, honesty and professionalism are two of our most important core values. Therefore it is imperative that we avoid and manage business conflicts between ourselves and our clients and candidates. We do not head-hunt from any of our retained clients and we always ensure we have the achievement of their business strategy front of mind.
- **Promoting a Culture Where People can Voice Concerns:** If any of our employees, partners or stakeholders know of, or have any suspicions of, any misconduct, malpractice, illegal or unethical behaviour, we encourage them to voice their concerns in confidence to the appropriate individual.

As a global business we have responsibilities to many stakeholders, including the local communities in which we operate.

Our Approach

We believe that we will have the greatest impact if our approach allows a local focus while not forgetting the 'bigger picture'. Where appropriate, we encourage our employees to take part in local community work and charitable events - in so doing, we are able to champion worthy causes that make a difference.

It is about creating an environment where every employee is given the support and encouragement they need to positively contribute to the world outside their workplace.

We focus on developing long-term relationships with charitable organisations, so that we can make a lasting difference. We also consult with our employees and partners to ensure we are helping support particular charities and pro-bono programmes that they are passionate about.

Opportunities and Risks

There are few risks associated with our community involvement. We're careful to make sure that all our activities adhere to our independence and compliance policies. The growing interest in measuring the social value of business activity, and in social enterprise as a way of tackling some of the toughest social issues in the world today, means there is increasing crossover between our community work and the work our key clients are participating in and encouraging.

Environmental Volunteering

Climate change and local development are adversely impacting biodiversity. Frequently, direct intervention is required to support areas of ecological importance and to maintain the environment for the people who live near our offices.

Our approach to environmental volunteering aims to increase our people's environmental education, and links global environmental issues to local volunteering activity. This allows us to help our people understand the value of natural capital and ecosystem services, and provides them with tips to support biodiversity at home.

When defining corporate responsibility, we believe that it is a statement which covers the entirety of the business and its impact on society.

For this reason our Corporate Responsibility Policy embraces environmental sustainability, equality and diversity, recruitment services, corporate governance, supplier choice and our behaviour as an employer and company values.

We believe that having a strong commitment to corporate responsibility will help us attract and retain the best people who share our core values.

We are committed to being a responsible business because we understand that corporate responsibility has a wider effect on the community, and therefore it is inevitably important to our clients, colleagues and customers.

We also believe that improving our understanding and delivery of our social and environmental responsibilities is important to sustaining our long term success as a leading search firm through improving our understanding of the local and international markets we work in.

For our firm, success means being responsible, as well as being able to demonstrate results of our efforts, e.g. taking a responsible approach to climate change, being a good employer evidenced through retention and brand management and ensuring that we are attracting high quality talent.

For us, sustainability is also about investing in the future by helping to improve the skills and aspirations of young people and our current employees.

We offer dedicated training structures to ensure our continued success.

Likewise, we want to work as part of our community working with not for profit organisations, making a valuable contribution to promoting human rights and improving the lives of people in need.

We define our social responsibility in four key areas:

- **Marketplace** – Responsibility to our clients, candidates, suppliers and partners as a leading recruitment and consulting company
- **Workplace** – Commitment to what we regard as our most valuable resource: our employees
- **Environment** – Doing all we can to reduce our impact on the environment
- **Community** – Ensuring all our offices are active partners in the communities in which they operate, acting with integrity and inspiring trust.

Definitive Consulting is committed to the highest standards of ethical business practice towards our candidates, clients, and suppliers.

- Definitive Consulting treats all employees with dignity and respect and provides opportunities for all employees to succeed through training and its business platform.
- Our services and facilities, where reasonably practicable, are to be accessible to all.
- All areas of our business operate a healthy and safe environment for our candidates, employees, visitors and contractors. Training is given to all employees and visitors to ensure a high level of occupational health and safety is followed at all times.
- We are committed to appropriate investment in our properties.
- We will not purchase from any organisation whose products are produced through the exploitation of child labour, paying an unfair wage in poor working conditions or any other violation of workers' human rights.
- We are committed to honesty and transparency in our communication with customers.

We recognise the value and importance of our employees within our business.

For this reason we ensure training and development, and managing talent is one of our highest priorities. We aim to embrace diversity, offer fairness and equality for all staff members, and provide a safe working environment for all.

The key employment policies within our organisation include:

- Training and development
- Diversity
- Anti-discrimination
- Flexible working
- Health and safety
- Recruitment and selection
- Stress.

Commitment to the Environment

Definitive Consulting actively seeks ways to minimise our environmental impact within the communities in which we operate.

Our environment management policy aims to:

- Reduce our energy consumption
- Manage our water supply to avoid waste
- Waste Management: Where possible we aim to recycle paper, glass and cardboard. We also encourage our staff members to only print when necessary in the bid to reduce waste
- Supplier choice: Where possible to try to choose suppliers who have the same values towards environment sustainability as we do. Wherever practical we purchase products made from renewable and ethically sound sources
- Training: In order to achieve our environmental goals, Definitive Consulting recognise that people are key to environmental success. All employees are encouraged to be environmentally responsible.

Commitment to the Community

Definitive Consulting works with stakeholders, clients and customers to understand community priorities and identify how we can play a role in supporting them.

To date in order to support our local communities we have:

- Supported local charities and assisted with fundraising activities and volunteer support
- Offered graduate recruitment schemes to assist young people in gaining working experience and career opportunities.

Environmental protection is integral to our position as a responsible business.

This policy provides a framework for managing the impact of all aspects of our operations on the environment.

It helps to set goals towards addressing the environmental issues most relevant to our activities and compliance will ensure that we achieve our commitment towards reducing any negative effect we may have on the environment.

We believe that we all have a responsibility to protect the environment by managing our energy consumption and using resources efficiently.

We are committed to addressing these issues by working with all who have an interest in our business to identify key environmental issues and seek solutions that enhance our environmental performance.

We have assessed our most significant environmental impacts as:

- We use electricity to keep warm or cool and to power office equipment
- We use gas for heating
- We travel by air, road and rail to visit our clients
- We use water in our offices for a variety of purposes
- We use resources such as paper
- We generate wastepaper, newsprint, plastic, toners and IT equipment.

We have therefore adopted the following commitments:

- We measure our most significant environmental impacts
- We comply with all relevant existing environmental legislation and regulations and corporate codes of conduct.

We expect our employees to promote an environmentally aware culture and help us meet the targets we set to improve our environmental performance through:

- Reducing the resources we use; Recycling what cannot be reused
- Helping reduce the amount of energy we use.
- Avoiding unnecessary travel on business or choosing the most environmentally friendly mode of transport consistent with business needs
- Providing feedback on how we are doing and how we could do better.

These commitments represent our position on environmental responsibility throughout our business operations across the world. It is endorsed by our senior management and communicated to all staff.

We will review this policy and our progress on an annual basis to maintain our commitment to environmental responsibility.

Definitive Consulting has adopted equality, diversity and inclusion as core values, and places all its policy development in the context of the following objectives:

- Ensuring that all individuals who come into contact with Definitive Consulting are treated with dignity and respect
- Ensuring that the opportunities Definitive Consulting provides for learning, personal development and employment are made available on a non-discriminatory basis
- Providing a safe, supportive and welcoming environment for staff and visitors.

Definitive Consulting seeks through all its policies and actions to be a genuinely inclusive organisation. The objective is to integrate the principles of equal treatment and promotion of diversity into all aspects of recruitment and employment.

Definitive Consulting is committed to a policy of equal opportunities for all and shall adhere to such a policy at all times.

We will review on an on-going basis all aspects of recruitment to avoid unlawful or undesirable discrimination.

Definitive Consulting will treat everyone equally irrespective of sex, sexual orientation, marital status, age, disability, race, colour, religion, ethnic or national origin, and places an obligation upon all staff to respect and act in accordance with the policy. Definitive Consulting is committed to providing training for its entire staff in equal opportunities practice.

Definitive Consulting shall not discriminate unlawfully when deciding which candidate is submitted for a vacancy or assignment. Definitive Consulting 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.

Definitive Consulting will not accept instructions from clients that indicate an intention to discriminate unlawfully.

Sex and Race Discrimination

Unlawful sex or race discrimination occurs in the following circumstances:

Direct Discrimination

Under all legislation relating to Sex Discrimination and Race Relations, direct discrimination occurs where one individual treats another individual less favourably on grounds of their sex or race than he/she treats or would treat other persons.

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

- 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.
- 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.

Indirect Discrimination

This is rather more subtle than direct discrimination, but the effect is the same. If there is an unjustified requirement or rule imposed which can only be met by a small number of people in a certain group, whilst applying it more generally to the rest of the group, it counts as indirect discrimination.

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

Definitive Consulting will not discriminate unlawfully when selecting candidates for a vacancy.

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

Definitive Consulting prides itself on its professionalism and adheres to all prevailing legislation relating to any form of discrimination in all of its work.

Disability Discrimination

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

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

Definitive Consulting will not discriminate against any job applicant or employee on the grounds of disability:

- In arranging interviews and in arrangements for determining to whom a job should be offered
- In the terms on which employment is offered
- By refusing to offer, or deliberately not offering, a person a job for reasons connected with disability
- In the opportunities afforded for a person to receive any benefit, or by refusing to afford, or deliberately not affording any such opportunity
- By subjecting him or her to any other detriment (detriment will include refusal of training, transfer, demotion, reduction of wage, or harassment).

Definitive Consulting 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.

Age Discrimination

Definitive Consulting 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.

Complaints and Monitoring Procedures

Definitive Consulting has in place procedures for dealing with complaints of discrimination in the form of our grievance procedure.

It is our policy to provide and maintain safe and healthy 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 implemented following the identification of work related hazards and assessment of associated risks.

It is also our policy to ensure that its business is conducted in a manner that reduces the risks to members of the public. We may require employees to attend such training and/or induction programmes in order to meet the aims of the company. Definitive Consulting accepts responsibility for the health and safety of other persons affected by its 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 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.

Employees 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
- Adhering to the Company procedures for securing a safe workplace.

Individuals will be nominated to undertake health and safety duties as required.

Any failure to adhere to the Company Health and Safety Policy and Procedures will be considered a serious disciplinary offence.

Accidents

The Company agrees to keep records showing details of all accidents which occur on the premises. Therefore all accidents, however minor to both employees and visitors, must be reported immediately.

Fire & Emergency

All employees, partners and visitors must observe the evacuation procedures laid down in the event of a fire or any other emergency situation. All employees, partners and visitors 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 posters throughout the office.

Responsibilities

Ultimate responsibility for health and safety rests at management level, with delegation of duty to supervisory employees.

Employees must rectify risks to health and safety themselves where possible. Failing this, the risk must be reported straight away to the designated health and safety officer for that particular Definitive Consulting office.

Medical Facilities

First Aid requirements must be met every working hour of the day for all employees whether working at the designated establishment or away. Employees must be made aware of the provision, and records must be kept of treatment administered.

Emergency Services

All employees are aware of the closest emergency services as part of the Definitive Consulting health and safety policy. This includes but is not limited to:

- Hospital with a casualty department
- Police station
- Fire station
- Electricity company
- Gas company
- Water company.

Training

Good training will ensure that employees are competent to carry out their tasks, thus reducing risk to health and safety.

Policies and Procedures

Copies of our full health & safety policies and procedures are available on request from the HR team.



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