

**Code of Conduct and Ethical Recruitment Policy**

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Policy Contact	Matthew Betteridge
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Target Audience	Agency Workers, clients and employees
Approved by	Matthew Betteridge

**Message from CEO**

*At One Call 24 Limited (OneCall24), our commitment to ethical behaviour and solid ethical foundations stands as a cornerstone of our operation. We firmly believe in conducting business the right way, guided by a culture of ethics and compliance.*

*Over time, we can effectively confront the demands of a competitive market environment by embracing the essential principles of moral responsibility, both as individuals and as a company. It is imperative that in carrying out their job duties, our employees consistently act lawfully, ethically, and in the best interests of OneCall24.*

*Thank you for upholding our values and helping us doing things right. It does not only mean that we provide well made, fairly priced and of exceptional quality services, but it also means that ethics and integrity is always born in mind. We exclusively procure services from suppliers with impeccable human rights and compliance records. Ensuring the integrity of our supply chain, we meticulously monitor our entire operation to uphold compliance with our Code of Conduct.*

Matthew Betteridge  
CEO

**Purpose**

This ethical Code of Conduct of OneCall24 stands as our ethical dedication and serves as a compass for proper business behaviour for all stakeholders involved. At OneCall24, we pledge to conduct our business activities in a legal, ethical, and transparent manner.

This document is applicable to all personnel affiliated with OneCall24, encompassing officers, directors, managers, team leaders, employees, temporary workers, subcontractor, or consultant staff, as well as other entities engaged in business with us.

OneCall24 expects its staff to uphold impartiality and honesty in all job-related matters. Employees are entrusted with the responsibility to act in good faith and preserve the trust vital for employment.

The success of our business depends upon the trust we earn from our employees, customers, and shareholders. We establish credibility by upholding our commitment to fairness and achieving our objectives through ethical means. Each staff member is anticipated to adhere to this Code both in their professional and personal conduct, treating all individuals with respect, honesty, and fairness. OneCall24 encourages an open dialogue at all times and prohibits any form of punishment or retaliation against individuals reporting misconduct in good faith.

Managers and leaders bear a heightened responsibility to exemplify the significance of this Code through their actions. They are tasked with promptly addressing any ethical inquiries or concerns raised. Employees are expected to cooperate fully in investigations related to potential or alleged misconduct.

### **Compliance with Legal Requirements and Framework Agreements**

Employees must act in accordance with all relevant laws, regulations, and industry standards governing sales practices, including but not limited to employment laws, data protection laws, and anti-bribery laws.

We are committed to adhere to every valid and binding contractual agreement that we conclude, and we do not abuse our rights.

Employees must ensure that all sales activities align with the terms and conditions outlined in the Framework Agreement, Specification, and any subsequent Call-off Contracts with healthcare settings.

Staff who fail to comply with the guidance detailed in this Policy could be subject, following full investigation, to disciplinary action up to and including dismissal. If through their actions or omissions staff are found to be in contravention of either this Policy or, indeed, their legal responsibilities then the Company reserves the right to take legal action if it deems it to be necessary to do so.

### **Anti-corruption and Bribery**

We unequivocally denounce and have zero tolerance for all forms of corruption and bribery. It is strictly prohibited to directly or indirectly offer, promise, give, ask for, solicit, or accept any unfair advantage or benefit with the intent to obtain, retain, or facilitate business activities in any manner. An unfair advantage or benefit may encompass cash, cash equivalents (such as vouchers), gifts, credits, discounts, travel perks, personal advantages, accommodations, or services.

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Engaging in corruption or bribery to gain or maintain business opportunities, or to gain an advantage in business dealings, constitutes gross misconduct. Similarly, accepting bribes or allowing others to do so is considered gross misconduct. Our staff is obligated to fully disclose and account for any benefits received during business transactions and must refrain from giving or receiving bribes or engaging in corrupt behaviour in any form.

For more detailed information, please refer to the OneCall24 Anti-Bribery Policy.

### **Fair competition and business conduct**

Our partnerships with business associates are forged on trust and mutual benefit in accordance with competition law. We remain dedicated in our commitment to ethical and equitable competition, prioritising the sale of services based on their quality, functionality, and competitive pricing. Our pricing and marketing decisions are made independently, without improper collaboration or

coordination with competitors. There is zero tolerance for offering or soliciting improper payments or favours, and we refrain from involvement in unlawful customer boycotts.

We uphold the integrity of tendering processes and avoid actions that undermine fair competition or damage the reputation of our partners. Any conduct that compromises a competitor's credibility is strictly prohibited.

Malicious, unlawful, or undue withholding of payments from our partners is not condoned, and such practices are prohibited within our supply chain. We actively oppose unethical practices such as the "debt chain."

Our staff is responsible for ensuring fair business during their job and adhere to every competition, consumer protection and fair marketing rule. Customers and business partners shall be treated fairly and equally, products and services shall be displayed in a manner that is fair and accurate (fair marketing and advertising), and that discloses all relevant information.

### **Sales Transparency and Unethical Practices**

Employees should provide customers with all relevant information necessary to make informed purchasing decisions, including pricing, terms, and conditions.

Any incentives or promotions offered to customers should be transparently disclosed, without misleading or deceptive practices.

Employees must refrain from using high-pressure sales tactics, coercion, or manipulation to influence healthcare settings into using our staffing services.

Unethical practices that prioritise financial or commercial gain over the well-being of healthcare settings, such as misrepresentation of our services or misleading information, are strictly prohibited. Employees will receive training on ethical sales practices, legal requirements, and company policies related to sales activities.

Sales activities will be monitored regularly to ensure compliance with this policy, and corrective action will be taken if any violations are identified.

Any concerns or suspicions regarding violations of this policy should be reported to the CEO for investigation. Reports will be handled confidentially and investigated promptly, with appropriate disciplinary action taken if necessary up to and including termination of employment.

### **Commitment to Ethical Supply Chain Management**

We will monitor supplier compliance with this policy through a range of tools to support the risk management, continuous improvement and capacity building of our suppliers, including audits, certifications, and third-party assessments.

OneCall24 recognises the responsibility that they share with their suppliers to operate ethically. Promoting decent working conditions in our supply chains is part of our strategy to act in a social responsible manner. In pursuit of our aims, we require that all our suppliers comply with our Code of Conduct and Ethical Recruitment Policy, which is based on the Fundamental Conventions of the International Labour Organisation (ILO) and national and international laws.

We expect all our suppliers to have ethical processes and policies in place throughout their supply chain. We will monitor supplier compliance with this policy through a range of tools to support the risk management, continuous improvement and capacity building of our suppliers, including the

requirements for suppliers to provide reasonable information as evidence of compliance to with our Ethical Trading Policy.

Suppliers to OneCall24 shall commit to ensure that:

- 1) Employment is freely chosen
  - a) There is no forced, bonded or involuntary prison labour.
  - b) Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.
- 2) Freedom of association and the right to collective bargaining are respected
  - a) Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
  - b) The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
  - c) Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
  - d) Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.
- 3) Working conditions are safe and hygienic
  - a) A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
  - b) Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
  - c) Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
  - d) Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
  - e) The company observing the code shall assign responsibility for health and safety to a senior management representative.
- 4) Child labour shall not be used
  - a) There shall be no new recruitment of child labour.
  - b) Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.
  - c) Children and young persons under 18 shall not be employed at night or in hazardous conditions.
  - d) These policies and procedures shall conform to the provisions of the relevant ILO standards.
- 5) Living wages are paid

- a) Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
  - b) All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
  - c) Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.
- 6) Working hours are not excessive
- a) Working hours must comply with national laws, collective agreements, and the provisions of 6b to 6f below, whichever affords the greater protection for workers. Sub-clauses 6b to 6f are based on international labour standards.
  - b) Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.\*
- \*International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.
- c) All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
  - d) The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.
  - e) Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:
    - this is allowed by national law;
    - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce,
    - appropriate safeguards are taken to protect the workers' health and safety; and
    - the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies
  - f) Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.
- 7) No discrimination is practised
- a) There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- 8) Regular employment is provided
- a) To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
  - b) Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

- 9) No harsh or inhumane treatment is allowed
  - a) Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

### **International Recruitment Code of Conduct**

We are proud to announce that OneCall24 is now part of the Ethical Recruiters List for international recruitment. By joining this list, we affirm our commitment to upholding the highest ethical standards in our recruitment practices.

In addition to our internal policies, we also adhere to the Code of Practice for International Recruitment in Health and Social Care. This code sets forth guidelines for ethical recruitment practices specific to the health and social care sector, ensuring that the rights and well-being of both candidates and the communities they serve are safeguarded.

Any employee found to be in violation of this Code of Conduct, including the ethical guidelines for international recruitment, will be subject to disciplinary action, up to and including dismissal. We take these standards seriously and expect all employees to uphold them without exception.

We encourage all employees to report any concerns or suspected violations of this Code of Conduct Policy promptly. Reports can be made anonymously, and every effort will be made to address and rectify any issues brought to our attention.

Note: Whilst OneCall24 does not hold a sponsoring license, it is important to note that as of May 2025, the UK Government has announced that the Health and Care Worker visa route will no longer be available for new overseas recruits in adult social care. Employers must demonstrate genuine domestic recruitment efforts before hiring internationally. The minimum salary threshold has increased to £38,700 for most roles. The Shortage Occupation List has been suspended, and only RQF Level 6 (degree-level) roles are eligible for sponsorship.

### **Review**

This policy statement will be reviewed annually as part of our commitment to upholding professional standards. It may be altered from time to time in the light of legislative changes, operational procedures or other prevailing circumstances