

# Corporate Responsibility and Environmental, Social and Governance Policy

## Introduction

Apex Resources Ltd is a privately owned Recruitment Business with an annual turnover of £55 million (Feb 2024) operating from Eight regional offices in London, Watford, Coventry, Manchester, Edinburgh and Glasgow with over 60 direct employees and over 2500 workers on weekly assignments offering services as an Employment Business within the Construction, Driving, Industrial, Rail and public sector markets throughout Europe.

Apex Resources Ltd recognises its Corporate Responsibility (CR) And Environmental, Social And Governance (ESG) commitments and these are reflected in this policy and in our other policies which include – Anti-Slavery Act 2015: Anti-Slavery & Human Trafficking Statement; Anti-Slavery and Human Traffic Policy, Anti-Bribery and Corruption Policy; Quality Policy, Blacklist Policy and Environmental Policy. Please refer to these other policies for a fuller picture of:

Our CR and ESG policies applies to all of the operations of Apex Resources Ltd and sets out the minimum standards which we expect from employees in their dealings with customers, candidates, stakeholders and third parties. We take account of our impact on all aspects of the business activities on the environment, society and the economy.

## Social

### Timely payment of suppliers

Apex is a strong believer in the doctrine that prompt payment of suppliers is an important part of the supplier relationship. Late payment issues affect organisations of all sizes, but small businesses are most vulnerable. Late payments affect a smaller business's cash flow to a greater extent than a large business. Smaller businesses also face difficulties in dealing with large organisations as a result of the inherent power imbalance. The government has introduced or proposes to introduce measures to deal with late payments to organisations:

### Late Payment of Commercial Debts legislation

Apex applies where relevant, the provisions of the Late Payment of Commercial Debts (Interest) Act 1998 (Late Payment Act 1998) which created a statutory framework in the UK for tackling late payment in commercial transactions, by giving suppliers a right to at least 8% a year interest on overdue payments for goods or services, plus a fixed sum and reasonable costs of recovering the debt.

*The government has added to this framework on numerous occasions, notably in August 2002 and March 2013 when it transposed the requirements of the Directive on combating late payments in commercial transactions (2000/35/EC) (Late Payments Directive 2000) and the*

*Directive on combating late payments in commercial transactions (recast) (2011/7/EU) (Late Payments Directive 2011) respectively into UK law.*

Most recently, in February 2018, the government amended the Late Payment of Commercial Debts Regulations 2002 (SI 2002/1674) (2002 Regulations) to expand the powers of trade bodies to challenge grossly unfair payment terms and practices on behalf of suppliers, in the hope that this would encourage more challenges to be brought.

### **Key provisions**

- The key provisions of the Late Payment Act 1998, as amended, are as follows:
- Suppliers are entitled to statutory interest of at least 8% above the Bank of England base rate for any late payment.
- If there is no agreed payment date, statutory interest starts to run after a 30-day period.
- Once statutory interest begins to run under the Late Payment Act 1998, the supplier is entitled to a fixed sum in addition to the interest on the debt. The amount is fixed by reference to the size of the overdue debt.
- The supplier also has an implied contractual right to be paid the reasonable costs of recovering the debt, less the fixed sum.<sup>1</sup>

### **Standards of Business Conduct**

We expect our staff (including temporary, agency, interim, contractor or consultant staff) to be supulously impartial and honest in all affairs relating to the Company and their job within it. All staff also bear a responsibility as employees to act as ambassadors for the Company in terms of their general conduct both within and outside the organisation. Our Standards of Business Conduct policy outlines the responsibilities of staff working for the Company and including this is not an exhaustive list;

- Anti-Bribery and Corruption;
- General Conduct;
- Whistleblowing;
- Common Law and;
- Confidentiality.

### **Customer Satisfaction**

At Apex Resources Ltd we understand the first step to providing the skills and expertise to deliver a reliable service is to eate an organisation that can identify expert knowledge and key

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<sup>1</sup> Source - Practical Law Corporate and Practical Law Environment

strengths, enabling us to position our people in the key areas where they can utilise their experience and expertise to achieving quality.

We encourage our people to adopt the same principles and look for the qualities in all our candidates as we do with our people, qualifications for the role, expertise and knowledge are at the forefront of our selection process.

## **Recruitment and Selection**

Inline with our 'Customer Satisfaction' and 'Equal Opportunities & Diversity' policies, recruitment and selection is central and crucial to the successful functioning of Apex Resources Ltd. It depends on finding people with the necessary skills, expertise and qualifications to deliver the Company's strategic objectives and the ability to make a positive contribution to the values and aims of the organisation.

Within our recruitment and selection of candidates plan, we ensure that our vacancies are not confined to a particular group of applicants and encourage a diverse work force.

Our recruitment has allowed us to bring about a diverse workforce. Contributing to our success within our industry allowing our team of staff to understand the needs of a wide range of candidates and clients. Our diverse workforce has also benefitted in enabling us to attract and retain talented individuals to help towards our continued future success.

## **Equal Opportunities and Diversity**

Apex Resources Ltd embraces and promotes diversity in all our business activities. We treat everyone equally/fairly and will not discriminate on the grounds of an individual's "protected characteristic" under the Equality Act 2010 (the Act). Our Equal Opportunities and Diversity policy covers but is not limited to;

- Direct Discrimination;
- Indirect Discrimination;
- Harassment;
- Victimisation;
- Disabled Persons;
- Age Discrimination and;
- Part-Time Workers.

## **Health and Safety**

The health and safety, welfare and wellbeing of employees is of paramount importance to the company. It is the policy of the company to create and improve standards of Health and Safety, which will lead to the avoidance and reduction of risks and to ensure that the company

complies with all Health and Safety legislation. A detailed Health and Safety Policy Statement is held and/or displayed at all branch premises.

Apex Resources Ltd makes every reasonable and practicable effort to provide a safe and healthy working conditions in all its offices. It is the duty of all employees to exercise responsibility and to do everything they can to prevent injury to themselves and to others.

The policy standards and procedures are communicated to employees through contracts of employment, staff hand books, operating manuals, bulletins and notice boards and staff training as appropriate.

## **Modern Slavery**

We are committed to eliminating modern slavery, human trafficking, forced labour and similar Human Rights abuses.

Due to the complexities in the substance and form of modern slavery the company has produced policies, statements and training to further our efforts in playing a part in tackling slavery.

Our attempts to identify and eliminate slavery include as contained in our Anti-Slavery Act 2015: Anti-Slavery & Human Trafficking Statement and Anti-Slavery and Human Traffic Policy;

- Understanding what slavery is;
- Identification of high risk areas;
- Suppliers;
- Reporting Slavery;
- Training;
- Performance indicators/ Monitoring our procedures

## **Environment**

We put great emphasis on client and operative partnerships to ensure quality of service. We have identified and comply with all environmental legislation relevant to our business activities and are committed to preventing pollution and reducing our impact on the environment as contained in our Environmental Policy, by:

- Implementing a system for recycling a wide range of waste streams, including paper, plastic containers, computers and monitors;
- Reducing energy consumption by using energy efficient bulbs, turning electrical equipment off when not in use, using sleep features, insulating our roof and building spaces, putting timers on heaters and using sensors to control lighting;
- Monitoring fuel consumption from company cars;
- Using eco-friendly products cleaning materials and products not tested on animals;

- Regularly supporting local charities and encouraging staff to develop themselves through education, training and voluntary work;
- Although we are already demonstrating a significant reduction in our environmental impacts, over the next 12 months we are also committed to -
- Continuing to monitor and reduce our environmental impact;
- Monitoring our water consumption and using water saving devices in our toilets and kitchenettes;
- Looking at ways to off-setting our carbon;
- Putting in place a purchasing policy that considers environmental issues in the decision making process as well as the lifecycle impact.

## **Governance**

Governance factors relate to Apex's leadership, executive pay, audits, internal controls and shareholder rights.

## **Bribery and Corruption**

Bribery is illegal under international law. However, the risk of corruption, money laundering and bribery is higher in some countries and sectors than others. For more information on our policy herein please see our:

- Anti-Slavery Act 2015: Anti-Slavery & Human Trafficking Statement; Anti-Slavery and Human Traffic Policy and Anti-Bribery and Corruption Policy and;
- Anti-Bribery and Corruption Policy.

We also thoroughly consider comply and are aware of the Money laundering rules and offences in the UK.

## **Corporate Governance and Directors**

**Corporate Governance** is the system by which companies are directed and controlled. It includes the effective leadership, independence and integrity of the board of directors, accountability, relationship with shareholders and director remuneration.

Annual reviews of our policies are undertaken as a minimum and changes are made in accordance with industry and legislative guidelines. The policy standards and procedures are communicated to employees through contracts of employment, staff hand books, operating manuals, bulletins and notice boards, staff training and staff meetings as appropriate.

We would also recommend you reading this policy in conjunction with the other policies noted in this policy.

## Contact Us

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Signed: 

Date: 02/12/2024

Tope Osazee, Director