



CODE OF ETHICS AND BUSINESS PRACTICES

Code of Ethics and Business Practices

The Code

The Code applies to all of us and reflects a commitment to the Company's values which we support and uphold and the principles set forth below as they are in the best interests of our candidates, employees, client organizations, and the integrity and reputation of 10% Recruiting Ltd.

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10 PERCENT RECRUITING LTD.

CODE OF ETHICS AND BUSINESS PRACTICES

I. Preamble

The Code of Ethics and Business Practices (Code) for 10 Percent Recruiting Ltd. (Company) applies to all of us, whether we are a board member, employee or independent sales associate. Our Code reflects a commitment to the Company's values and provides a framework to guide ethical conduct in a way that upholds the integrity and reputation of the Company. We support the principles set forth below and acknowledge that compliance with these principles is in the best interests of our candidates, employees, client organizations, and the reputation of the search, employment and staffing services profession in Canada. We are expected to behave in a way that aligns with this Code. We understand that this Code does not cover every specific scenario. Therefore, we use the spirit and intent behind this Code to guide our conduct, and exercise care and diligence in the course of our work with the Company.

To demonstrate commitment to transparency and accountability, this Code is available to the public on the Company's website.

II. Core Values

- a. Building relationships...
 - i. actively build lasting relationships with all clients, candidates, partners, communities, investors and each other.
 - ii. build trust by listening, following through and keeping our word.
 - iii. We act with impartiality and integrity in all we do.
 - iv. Treat clients, candidates, partners, and each other with respect, fairness and dignity.
 - v. We demonstrate respect, accountability, and empathy.
- b. Customer focus
 - i. Deliver with excellence and on-time.
 - ii. Provide value to every customer interaction.
 - iii. Open communication and collaboration are fundamental to our success.
- c. Entrepreneurship
 - i. Create an environment that helps people succeed and maximize their potential.
 - ii. Take ownership and stand by our results.
 - iii. Act upon opportunities.
 - iv. Learn fast from success and failure.

- v. Inspire others, continuously seek innovation and push beyond the obvious.

III. Guiding Principles

These principles guide our behaviour and decisions:

- a. We will observe the highest principles of integrity, professionalism, and fair practice in dealing with clients, candidates, employees, and all regulatory authorities; and will respect the confidentiality of records in accordance with law and good business practices.
- b. We will provide leadership in the adherence to both the spirit and letter of all applicable human rights, employment laws, and regulations. We will treat all candidates and employees with dignity and respect and will not accept an order from any client that is discriminatory in any way.
- c. We will comply with all laws and regulations applicable to our business, and to maintain high standards of ethical conduct in the operation of that business and in our dealings with employees, clients, and competitors.
- d. We will take all reasonable steps to provide clients with accurate information on each candidate's employment qualifications and experience; and will only present those candidates who have given us authorization to represent their application for employment.
- e. We will supply candidates and employees with complete and accurate information as provided by the client; regarding terms of employment, job descriptions, and workplace conditions.
- f. We will ascertain that employees are assigned to work sites that are safe, that they understand the nature of the work the client has called for and can perform such work without injury to themselves or others, and that they receive any personal safety training and equipment that may be required.
- g. We will take prompt action to address employee questions, concerns, or complaints regarding unsafe work conditions, discrimination, or any other matter involving the terms and conditions of their employment.
- h. We will not recruit, encourage or entice a candidate whom we have previously placed to leave the employ of our client, nor will we encourage or coerce an individual to leave any temporary assignment before the stated completion date.
- i. We will not restrict the right of a candidate or employee to accept employment of their choice.
- j. We will not misuse membership privileges for the purpose of recruiting a member's staff, or in any way that may otherwise injure our candidates, employees or competitors.

- k. We will derive income only from clients and make no direct or indirect charges to candidates or employees.
- l. We will either avoid or disclose a potential conflict of interest that might influence or might be perceived to influence personal actions or judgments.
- m. We will maintain the highest standards of integrity in all forms of advertising, communications and solicitations, and will conduct our business in a manner designed to enhance the operation, image, and reputation of the employment, recruitment, and staffing services industry.
- n. We will recognize and respect the rights and privileges of competitors in the true fashion of individual initiative and free enterprise, and will refrain from engaging in acts of unfair competition.
- o. We will ensure that our clients, candidates, and employees are aware of our duty to abide by this Code of Ethics & Business Practices and such supporting policies and guidelines as may from time to time be adopted by the Company.
- p. We know that when we become aware of a real or apparent conflict of interest, we must, at the first opportunity, disclose this conflict to a Company director.
- q. We encourage our colleagues to act fairly and ethically raise concerns about a suspected breach by another to a Company director without fear of reprisal.
- r. We know that breaches of this Code may result in disciplinary action, up to and including removal if we are a member or termination if we are an employee or independent sales associate.
- s. Each of us confirms *on an annual basis* our understanding of, and commitment to, the Code's expectations.

IV. Behavioural Standards

Behavioural standards help us make appropriate decisions when the issues we face involve ethical considerations. Behavioural standards cannot cover all scenarios but provide guidance in support of day-to-day decisions. All of us must adhere to the following standards:

- a. We must not engage in any criminal activity and comply with all relevant laws, regulations, policies and procedures.
- b. Our conduct contributes to a safe and healthy workplace that is free from discrimination, harassment, or violence.
- c. We must not use drugs or alcohol in a way that affects our performance and safety or the performance and safety of our colleagues, or that negatively impacts the reputation or operations of the Company.
- d. We must act in a way that is consistent with the Company's protocols on public comment.

- e. We must take reasonable steps to avoid situations where we may be placed in a real or apparent conflict between our private interests and the interests of the Company.
 - 1. Confidential Information
We must respect and protect confidential information, use it only for the work of the Company, and not use it for personal gain. We must comply with protocols that guide the collection, storage, use, transmission, and disclosure of information.
 - 2. Gifts and Gratuities
We must not accept or receive gifts and gratuities other than the normal exchange of gifts between friends or business colleagues, tokens exchanged as part of protocol or the normal presentation of gifts to people participating in public functions.

V. Affirmation

The Code of Ethics for 10 Percent Recruiting Ltd. was reaffirmed on September 20, 2015 and is reaffirmed annually by the Board to ensure it remains current and relevant.