



360 Agency Middle East FZ LLC

Business Ethics and Conduct Policy

Version 1.2 | Date: 28 March 2024

1. Introduction

360 Agency Middle East FZ LLC, registered in Fujairah, UAE, is dedicated to upholding the highest standards of integrity, professionalism, and ethical conduct across all facets of our operations. This Business Ethics and Conduct Policy delineates comprehensive guidelines governing our engagements with clients, candidates, and employees, ensuring strict compliance with relevant laws and ethical norms.

2. General Principles

- **Integrity:** We pledge to uphold honesty and integrity in all business transactions, fostering a culture of trust and transparency.
- **Respect:** We cherish diversity and honor the rights and dignity of every individual.
- **Transparency:** We commit to maintaining clear and open communication with all stakeholders.
- **Accountability:** We take accountability for our actions and their repercussions on others.

3. Staff Conduct

- **Professionalism:** Employees are expected to exhibit professionalism in all interactions, including those conducted through WhatsApp, email, web-based chat systems, Zoom, and Microsoft Teams.
- **Confidentiality:** Staff members must safeguard all proprietary and personal information, refraining from any unauthorized disclosures.
- **Conflict of Interest:** Employees are obliged to avoid situations where personal interests conflict with the interests of the company and promptly disclose any potential conflicts.
- **Compliance with Laws:** Adherence to all applicable laws, regulations, and internal policies is mandatory.
- **Non-Tolerance of Racism and Sexism:** The company has a zero-tolerance policy towards racism, sexism, and any form of discrimination or harassment.
- **Bribery and Corruption:** Acceptance of bribes is strictly prohibited. Employees encountering such situations must report them to the General Manager.



immediately. In the event of a client offering a bribe to the General Manager, appropriate measures, including legal or police action, will be pursued.

4. Candidate Conduct

- **Accuracy of Information:** Candidates are required to provide accurate and truthful information.
- **Professional Behavior:** Candidates must maintain professional conduct throughout the recruitment process and in all communications.
- **Respect and Non-Discrimination:** Candidates must treat all staff, fellow candidates, and clients with respect.
- **No Fees Charged to Candidates:** 360 Agency does not levy any fees on candidates. Our services are remunerated by hiring clients. Candidates are responsible for handling any visa or travel-related expenses themselves, or such costs must be directly paid or reimbursed by the clients.

5. Client Conduct

- **Fair Treatment:** Clients are obligated to treat all candidates and agency staff with fairness and respect.
- **Compliance with Agreements:** Clients must adhere to all mutually agreed terms and conditions, including payment terms.
- **Non-Discrimination:** Clients must ensure that their recruitment practices comply with anti-discrimination laws.
- **Prepayment for Recruitment Trips:** Clients must prepay all expenses associated with recruitment trips, encompassing venues, flights, and accommodations.
- **Confidentiality of Candidate Information:** Clients are prohibited from sharing candidate information with external entities or hiring candidates without informing 360 Agency. Clients must ensure that candidate data remains confidential, especially during transitions of HR personnel.
- **Professionalism and Human Rights:** We exclusively collaborate with registered companies that uphold human rights standards and treat all candidates and employees ethically. We endeavor to associate with professional clients.
- **Data Responsibility:** Clients must ensure that no unauthorized individual within their organization can access candidate data, particularly in instances where an HR manager resigns and retains data.

6. Communication Channels

- **WhatsApp:** For rapid, informal communication.
- **Email:** For formal communication and documentation.
- **Web-Based Chat Systems:** For real-time support and inquiries.
- **Zoom and Microsoft Teams:** For virtual meetings and interviews.



7. Reporting and Accountability

- **Reporting Misconduct:** Employees must promptly report suspected policy violations to the designated ethics officer or management.
- **Investigation:** All reported incidents will be thoroughly and impartially investigated.
- **Disciplinary Actions:** Violations may result in disciplinary measures, including termination of employment.

8. Confidentiality

- **Information Protection:** We ensure the confidentiality of all client, candidate, and company information, guarding against unauthorized disclosures.
- **Data Security:** We adhere to data protection laws and securely manage electronic and physical records.
- **Data Retention:** Candidate information is retained until requested removal. We neither sell nor provide database access to third parties. In the event of a data breach, affected individuals and the public will be promptly notified.

9. Conflict of Interest

- **Disclosure:** Employees must disclose any personal or financial interests that may conflict with their responsibilities.
- **Avoidance:** Employees must steer clear of potential conflicts of interest and transparently manage disclosed conflicts.

10. Compliance with Laws

- **Legal Adherence:** All employees are obliged to comply with all pertinent laws and regulations.
- **Anti-Bribery and Corruption:** Bribery and corruption are strictly prohibited. Employees must neither offer, solicit, nor accept bribes.

11. Respect and Non-Discrimination

- **Inclusive Environment:** We foster a workplace devoid of discrimination and harassment.
- **Zero Tolerance:** Discrimination or harassment based on any characteristic is unequivocally prohibited.

12. Health and Safety



- **Safe Workplace:** We furnish a safe and healthy work environment, adhering to health and safety regulations.
- **Well-being:** We prioritize the physical and mental well-being of our employees.

13. Return of Information and Announcements

- **Return and Destruction:** Employees must return or destroy all confidential information upon termination of employment or engagement.
- **Public Statements:** Employees may not issue public statements on behalf of the company without authorization.

14. Reservation of Rights, Acknowledgement, and Indemnity

- **Rights Reserved:** The company reserves all rights to confidential information and intellectual property.
- **No Warranties:** The company provides no guarantees regarding the accuracy or completeness of shared confidential information.
- **Indemnity:** Employees are obligated to indemnify the company against losses stemming from policy breaches.

15. Miscellaneous

- **Policy Amendments:** Employees will be apprised of any policy updates or amendments.
- **Acknowledgement:** Employees must acknowledge their understanding and acceptance of this policy.
- **Duration of Obligations:** Obligations under this policy persist indefinitely, even post-termination.

16. Environmental Responsibility

- **Sustainable Practices:** We endeavor to minimize environmental impact by adopting sustainable practices.
- **Green Initiatives:** We support initiatives advancing environmental sustainability.

17. Verification and Liability Disclaimer

Verification Efforts: We strive to verify all candidate information through rigorous checks.
No Liability for Inaccuracies: 360 Agency cannot be held liable for inaccuracies or misrepresentations in candidate information. Clients are responsible for conducting their due diligence during the hiring process.



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By adhering meticulously to these guidelines, 360 Agency Middle East FZ LLC ensures a professional, respectful, and legally compliant environment for all stakeholders. For further elucidation or inquiries, please liaise with our ethics officer or management team.

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