

DOC.REF.ACC.PLCY.02025 Effective from 1st December 2024

ADD BOOST 360 Limited COMPANY REGISTRATION NO. 6294297 | 124 City Road, London, EC1V 2NX



Index – Recruitment Policy

Date: 11th August 2025.

(DOC.REF.ACC.PLCY.02025 – Effective 11th August 2025)

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Summary of the updates/inclusions made in the new Recruitment Policy

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(DOC.REF.ACC.PLCY.02025 – Effective 11th August 2025) compared to the previous version (DOC.REF.ACC.PLCY.02024 – Effective 1st December 2024):

1. Expanded Policy Structure & Details

- 1. **Detailed procedural breakdown** under each section, including subsections for Job Analysis, Advertising, Application Process, Shortlisting, Pre-Employment Checks, Contracts, Onboarding, and Probation.
- 2. Inclusion of examples, compliance references, and explanation of UK laws (Equality Act 2010, Employment Rights Act 1996, IR35, Data Protection Act 2018) to strengthen legal alignment.

2. New Section – "Digital Identity, Website Display, and Financial Conduct" (Section 8 in new policy)

This is entirely new and did not exist in the previous version.

Key points introduced:

- **a.** No Physical ID Cards The company will not issue physical ID cards to freelancers or employees.
- **b. Digital Talent Pool Profile** Option to display a verified, limited-profile ID on the company's website (name, employee/freelancer number, designation, and optionally a verified photo). No legal ID such as passport or national ID will ever be shown.
- **c.** Consent Requirement Workers must give explicit written/electronic consent for their profile to appear online; they can withdraw consent anytime.
- **d. Prohibition on Unauthorized Payments** Employees and freelancers cannot collect money from clients or third parties unless officially authorized in writing. Violations can lead to disciplinary or legal action.
- **e. Purpose & Compliance** Emphasis on transparency, fraud prevention, and compliance with the Data Protection Act 2018 and international standards.

3. Expanded "National and International and Freelance Recruitment" Section (Section 7 in new policy)

- More detailed **regional compliance guidance** for:
 - o EU Working time regulations, GDPR, local labor laws.
 - o US IRS classification rules, state laws (e.g., AB5), intellectual property provisions.
 - Asia Local contract laws, stamp duty, tax withholding.
- **Local Notarization** May require contracts to be notarized or co-signed by a local attorney for enforceability abroad.
- Cultural and Time Zone Considerations Adjust scheduling, provide translations.
- **International Data Transfers** Compliance with GDPR adequacy rules and standard contractual clauses.

4. Enhanced "Pre-Employment Checks" (Section 4.5)

- Added requirement for video interview identity verification.
- More detail on acceptable ID types and the authenticity verification process.
- Clarified **background check procedures** in compliance with the Rehabilitation of Offenders Act 1974.





5. Strengthened "Employment Contracts and Agreements" (Section 4.6)

- Clarified written contract requirements under UK law.
- Detailed **freelancer agreement clauses** to comply with IR35.
- Added explicit requirement for notarization or witness for certain international engagements.

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• Stated that **original signed documents must be couriered** to the UK head office for records.

6. Expanded "Onboarding" and "Probation" Clauses (Sections 4.7 & 4.8)

- Added **training on compliance areas** (data protection, information security, industry-specific regulations).
- More detail on **probation monitoring**, documentation, and possible extensions.



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This policy replaces the previous Recruitment Policy (DOC.REF.ACC.PLCY.02024) effective 1st December 2024.

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1. Purpose

The purpose of this Recruitment Policy is to establish a transparent, equitable, and legally compliant recruitment process for ADD BOOST 360 Limited. It is designed to align with all relevant UK laws and regulations and applies to the hiring of both direct employees and freelancers, both locally and internationally. This ensures that recruitment practices are fair and consistent for all candidates, regardless of employment status or location.

2. Scope

This policy covers **all** recruitment activities for ADD BOOST 360 Limited. It encompasses every stage of the hiring process, including job analysis, advertising of vacancies, application management, candidate selection, hiring, and onboarding of new team members. The policy applies to recruitment for **direct employees** (permanent or fixed-term staff) as well as **freelance contractors**, and it governs both UK-based and international recruitment efforts. All staff involved in recruitment must adhere to this policy to ensure consistency and legal compliance in every hire.

3. Principles.

ADD BOOST 360 Limited is committed to the following core principles in recruitment:

- a. Equal Opportunity: We provide equal opportunity for all candidates and do not tolerate any form of unlawful discrimination. Recruitment decisions are based solely on merit i.e., the candidate's skills, experience, and suitability for the role in line with the Equality Act 2010. All candidates will be assessed fairly, and reasonable adjustments will be made to accommodate disabilities or special needs as required.
- b. Non-Discrimination: The Company strictly prohibits discrimination on the basis of race, color, nationality, ethnic origin, sex, gender identity, sexual orientation, marital status, age, religion or belief, pregnancy or maternity, disability, or any other protected characteristic as defined under the Equality Act 2010. All stages of recruitment from advertising to interviewing and selection shall be conducted in a manner that upholds our non-discrimination policies.
- c. Legal Compliance: We comply with all applicable UK employment laws and regulations throughout the recruitment process. This includes, but is not limited to, the Equality Act 2010, Employment Rights Act 1996, Data Protection Act 2018, and the IR35 off-payroll working rules. Compliance with these laws ensures that our hiring practices are fair, transparent, and lawful. For example, all direct employees will receive written terms of employment as required by the Employment Rights Act 1996, and our freelancer engagement practices are structured to comply with IR35 regulations.
- d. Transparency and Accountability: The recruitment process will be transparent at every stage. Candidates will be informed of the process and requirements, and hiring managers will document their decisions to provide a clear audit trail. Any potential conflicts of interest in the recruitment process must be declared. The Company is committed to accountability in hiring, meaning we will regularly review our practices and decisions to ensure they remain fair and effective.



4. Recruitment Procedure

4.1 Job Analysis and Planning

a. **Define Role Requirements:** Clearly define the job role, including key responsibilities, required qualifications, and desired competencies or experience for the position. Proper job analysis ensures that selection criteria are relevant and directly related to the job.

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b. Determine Employment Status: Decide whether the role will be filled by a direct employee or a freelance contractor at the planning stage, in line with UK regulations and IR35 guidelines. This determination will consider the nature of the work, its duration, and the level of control/direction the company will exercise, to ensure compliance with IR35 (i.e., confirming if a freelancer is genuinely self-employed or effectively operating as an employee). Proper classification is important to fulfill legal obligations and tax requirements.

4.2 Advertising the Position

- a. Inclusive Job Advertisements: Prepare and publish job advertisements that are inclusive and free of discriminatory language. All job postings must focus on the skills and qualifications required for the role and avoid any wording that might discourage or exclude certain groups (consistent with the Equality Act 2010). For example, words indicating age or gender preferences are not permitted.
- **b.** Advertising Channels: Advertise vacancies on the company's official website, reputable job boards, and other relevant platforms to attract a diverse pool of qualified candidates. Where appropriate, outreach may include professional networks or industry-specific forums. All advertisements will include a brief equal opportunity statement to reinforce the Company's commitment to non-discrimination.

4.3 Application Process

- a. Standardized Applications: Use a standardized application form or process for all candidates to ensure consistency. This helps in collecting comparable information (e.g., work history, qualifications) and allows for fair evaluation against the job criteria. Applicants should submit required documents such as a CV/résumé and references in the format specified.
- b. Data Protection Compliance: All personal data collected from candidates will be handled in strict accordance with the Data Protection Act 2018 and UK GDPR requirements. Candidates must be informed about how their data will be used, stored, and retained during the recruitment process. Personal data will only be collected if it is necessary for recruitment, kept secure and confidential, and not shared inappropriately. We will retain candidate data only for as long as needed for the recruitment purpose or as required by law, after which it will be securely disposed of.

4.4 Shortlisting and Interviewing

- a. Shortlisting Criteria: Shortlist candidates based on predefined, objective criteria derived from the job requirements. A scoring or rating system may be used to evaluate how well each applicant meets the essential and desirable criteria. Those involved in shortlisting must apply the criteria consistently for all applicants.
- **b. Interview Process:** Conduct structured interviews with shortlisted candidates to ensure fairness and consistency. Interview questions will be prepared in advance and will relate to the competencies and requirements of the job. All interviewers will be trained on fair recruitment and equal opportunity practices.
- c. Permissible Interview Modes: Interviews may be conducted in person or via secure video conferencing, depending on the candidate's location and availability. In all cases, we ensure that the



interview method allows for an effective and equitable assessment of the candidate. Candidates will be given clear instructions for video interviews, and the identity of the candidate will be verified at the start of a video interview for security.

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d. Avoiding Discriminatory Questions: Interviewers must not ask questions that are discriminatory or unrelated to the job (e.g., questions about personal life, family plans, religion, etc. that are not relevant to the role). We strictly adhere to Equality Act 2010 guidelines in interviews, focusing only on the candidate's ability to perform the job. If a candidate requires reasonable adjustments for the interview (such as due to a disability), the Company will accommodate these to ensure a fair opportunity.

4.5 Pre-Employment Checks

- a. Right to Work Verification: Verify each candidate's legal right to work in the UK or in the relevant jurisdiction for the position. This involves checking original, valid documentation (such as passports, visas, or work permits) in line with Home Office requirements. Copies of these documents will be securely stored as evidence of compliance. Candidates from outside the UK must provide proof of their right to work in their home country and, if applicable, any visas or permits needed to work with a UK company.
- **b. Identity Verification:** Confirm the identity of the selected candidate through government-issued photo identification. Acceptable forms of ID include a passport, national ID card, or driver's license, which should be current and authentic. The name, photograph, and other details will be checked to ensure they match the candidate and the details provided in the application.
- c. Background and Reference Checks: Conduct relevant background checks (such as verification of employment history, education, and professional qualifications) and obtain references from previous employers or clients, as appropriate. Any background check will comply with legal requirements, including the UK Rehabilitation of Offenders Act 1974 for criminal record checks (i.e., we will only inquire about unspent convictions unless an exception applies to the role). Reference checks will focus on the candidate's work experience and reliability, and will be carried out with the candidate's consent.

4.6 Employment Contracts and Agreements

- a. Written Contracts for Employees: Issue a written employment contract to every successful direct employee hire, before or on the first day of employment, as required by law. The contract will include all key terms of employment as mandated by the Employment Rights Act 1996 such as job title, duties, salary, working hours, holiday entitlements, notice periods, and other essential conditions. Both the employee and an authorized company representative must sign the contract to acknowledge acceptance of the terms.
- b. Freelancer Agreements: For freelancers or independent contractors, provide a formal Freelance Service Agreement that outlines the project scope, deliverables, payment terms, deadlines, and the independent nature of the working relationship. The agreement will clearly state that the engagement is on a contract-for-services basis and not an employment contract, in order to comply with IR35 regulations and avoid misclassification. It will also specify the freelancer's obligations (e.g. maintaining their own insurance, paying their own taxes) and any relevant intellectual property or confidentiality clauses.
- c. IR35 Compliance: The Company will assess each freelancer engagement in line with IR35 rules to determine if the freelancer is genuinely self-employed or effectively operating as an employee. If an engagement falls inside IR35 (meaning the freelancer would be deemed an employee for tax purposes), the Company will ensure the appropriate tax and National Insurance contributions are accounted for according to HMRC guidelines. Our freelancer contracts and working practices are structured to uphold compliance with IR35 and related HMRC regulations, thereby mitigating the risk of legal or tax liabilities for both the Company and the contractor.



d. Signing and Execution of Agreements: All employment contracts and freelance agreements must be signed by the candidate and by a duly authorized representative of ADD BOOST 360 Limited before the individual commences work. For international freelancers or remote employees, the contract may be signed electronically initially (to expedite the process), but a hard copy with original signatures is required for finalization. Where appropriate (particularly for overseas engagements), the Company may require the agreement to be notarized or witnessed by a local notary or lawyer to ensure it is legally enforceable in the local jurisdiction. This extra step helps confirm the identity of the signatory and the validity of the contract under local laws.

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e. Document Submission and Recordkeeping: After signing, the original signed documents – including the contract/agreement and any critical supporting documents (such as copies of identification and proof of qualifications) – must be sent via courier to ADD BOOST 360 Limited's head office in the UK. The Company will securely retain these original documents in its records. Having original signed contracts on file is necessary for legal enforcement and auditing purposes. The Company will also provide a countersigned copy of the contract/agreement to the employee or freelancer for their own records.

4.7 Onboarding

- a. Induction Program: Provide every new hire (employee or freelancer) with an appropriate induction. For direct employees, this includes an orientation program covering the company's structure, mission, policies (including this Recruitment Policy and other HR policies), health and safety protocols, and an introduction to their team and workplace. Freelancers will receive a streamlined introduction relevant to their project, including briefing on project objectives, key contacts, and relevant company policies (e.g., data protection and confidentiality).
- b. Training and Compliance: Offer relevant training to support the new team member's integration and performance. This may include job-specific training, as well as training on compliance areas such as data protection, information security, or industry-specific regulations. All new employees will be made aware of their rights and responsibilities under UK employment law (for example, understanding company policies on equal opportunity, harassment, and data security). Ensuring that every hire is well-versed in these areas from the start helps maintain compliance and promotes a safe, productive work environment. If the new hire is a freelancer, the Company will ensure they understand the scope and standards expected for the project and how to comply with any applicable regulations (such as data protection when handling company data).

4.8 Probation and Performance Review

- a. Probationary Periods: Implement probationary periods for new direct employees, typically lasting [X] months (the specific duration will be defined in the employment contract). During this period, the employee's performance, conduct, and overall fit for the role will be assessed to ensure that the hiring decision was appropriate. The employee will receive guidance and feedback during the probation. Successful completion of the probationary period will be confirmed in writing. If issues arise, the Company may extend the probation or, if necessary, terminate employment in line with legal requirements and the terms of the contract.
- b. Performance Monitoring: For both new employees and ongoing contractors, the Company will monitor performance and provide feedback regularly, especially in the early stages of the engagement. This ensures that any concerns are addressed promptly and that the individual has the support needed to meet the Company's expectations. Formal performance reviews will be conducted at the end of the probationary period for employees, and at key milestones or completion for freelancers, to document performance outcomes.
- c. Policy Adherence: Throughout the recruitment and onboarding stages, the Company will keep records of the steps followed (e.g., interview notes, reference check results, copies of documents, signed agreements). These records are reviewed to ensure that each recruitment followed this policy. Any



deviations or issues identified will be analyzed so that the recruitment process can be improved continuously. The HR department is responsible for monitoring compliance with this policy and reporting on recruitment metrics and any concerns to senior management.

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5. Equal Opportunity and Anti-Discrimination

ADD BOOST 360 Limited fully upholds the principles of the Equality Act 2010 in all recruitment and employment activities. This means:

- a. Merit-Based Selection: All hiring decisions are based on merit the ability of the candidate to perform the job and no candidate will receive less favorable treatment on any prohibited grounds. We foster a diverse and inclusive workplace by actively encouraging applications from all sections of society and by ensuring our job criteria and selection methods are free from bias.
- **b. Anti-Discrimination Measures:** Recruiters and managers involved in hiring are trained on equal opportunities and diversity. We maintain a **zero-tolerance policy** for discrimination or harassment. If a candidate believes they have been treated unfairly or discriminated against during the process, they are encouraged to report it, and the Company will investigate promptly.
- c. Reasonable Adjustments: In line with the Equality Act, the Company will provide reasonable adjustments at any stage of recruitment for candidates with disabilities or special requirements. For instance, this could include offering application forms in accessible formats or adjusting interview arrangements (such as providing additional time or assistive technology). Our goal is to give every candidate an equal chance to demonstrate their suitability for the role.

By adhering to these commitments, ADD BOOST 360 Limited ensures a fair hiring process that values diversity and complies with all anti-discrimination laws. Any employee involved in recruitment who is found to have violated equal opportunity principles may face disciplinary action.

6. Data Protection and Privacy

We recognize our obligations under the Data Protection Act 2018 (which incorporates the principles of GDPR) and are committed to protecting the privacy of candidates. Key points include:

- a. Lawful and Fair Use of Data: All personal data obtained during recruitment (e.g., CVs, application forms, interview notes, test results) will be collected and processed lawfully, fairly, and transparently. Candidates' data will be used only for recruitment and hiring purposes or to fulfill legal requirements. We explain to candidates how their data will be used at the point of collection (for example, on the application form or via a privacy notice).
- b. Data Minimization: We only ask for information that is relevant to the recruitment decision. Data that is not necessary (for instance, information on protected characteristics that are not job-related) will not be requested during the selection process. Any equal opportunities monitoring data will be kept separate from applications and used solely for anonymized statistical analysis.
- c. Security and Confidentiality: Candidate information is stored securely (whether in electronic systems or physical files) and access is restricted to authorized personnel involved in the hiring process. We maintain appropriate technical and organizational measures to prevent unauthorized access, loss, or breach of personal data. All staff handling candidate data are bound by confidentiality agreements.
- d. Retention and Deletion: Personal data of candidates will not be kept longer than necessary. For successful candidates, relevant data will be transferred to their employee personnel file and retained per employment record requirements. For unsuccessful candidates, we will typically retain recruitment data for a defined period (e.g., 6 months to 1 year) in case of legal challenges or future opportunities, after which it will be securely deleted or destroyed. Candidates are informed of these retention periods and



have rights under the Data Protection Act to access or request deletion of their data (within legal allowances).

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By following these practices, ADD BOOST 360 Limited ensures compliance with the Data Protection Act 2018 when handling candidate data and protects individuals' privacy throughout the recruitment process. Any data breaches or suspected mishandling of personal data will be taken seriously and managed in accordance with our data breach response procedures and legal obligations to notify authorities if required.

7. International and Freelance Recruitment

When recruiting outside of the UK or engaging freelancers based overseas, ADD BOOST 360 Limited will ensure compliance with all relevant laws in the candidate's country or region. Our approach includes:

- a. Immigration and Work Authorization: For any international hire (whether an employee or a contractor), we will verify and adhere to immigration laws. This means ensuring the individual has the legal right to work in the country where the work will be performed, and obtaining any necessary work permits or visas. If the Company is sponsoring a work visa (for a direct employee relocating to the UK, for example), all Home Office requirements and resident labor market tests (if applicable) will be followed.
- b. Compliance with Local Employment Laws: We align our recruitment and contracting practices with the local laws of the candidate's jurisdiction. This involves consulting local legal requirements for hiring or contracting, such as mandatory contract terms, statutory benefits, or tax obligations. For instance:
 - 1. **European Union (EU):** When hiring freelancers or employees based in EU countries, we comply with relevant EU directives and the specific labor laws of that country. This may include adhering to working time regulations, minimum wage laws, and ensuring any personal data transfer complies with GDPR. We also recognize professional qualifications and employment rights as appropriate under EU and local legislation.
 - 2. United States (US): For freelancers or consultants based in the US, we ensure compliance with US federal and state laws regarding independent contractors. This includes correctly classifying the individual as a contractor (following IRS guidelines and common-law tests to avoid misclassification) and respecting any state-specific rules on contractor engagements (e.g., California's AB5 law if relevant). We also address intellectual property and work-for-hire provisions according to US standards. The freelancer will be responsible for their own US taxes, but our agreement will clarify the arrangement to satisfy IRS requirements.
 - 3. **Asia (e.g., India, UAE, etc.):** For individuals in Asian countries, we follow the local labor and contract laws of the specific country. We may engage local counsel to ensure our freelancer contracts meet any legal requirements (for example, stamp duty or registration requirements in certain jurisdictions). If local law requires any particular format or clauses (such as a limit on contract length, or provisions for termination), those will be included. We also ensure compliance with any relevant tax withholding or reporting obligations when paying an overseas contractor.
- c. Local Notarization and Legal Enforcement: To enforce agreements internationally, the Company may utilize local legal resources. As noted in Section 4.6, contracts with overseas freelancers or employees might be notarized or co-signed by a local attorney if needed for validity. Additionally, ADD BOOST 360 Limited will comply with any requirements to file or register employment or contractor agreements with local authorities if the local law mandates it. Our goal is to make sure that our contracts are not only compliant on paper but also enforceable in practice in the foreign jurisdiction.
- d. Cultural and Time Zone Considerations: The recruitment team will remain sensitive to cultural differences and time zone variations when recruiting abroad. Interview scheduling, contract



negotiations, and onboarding will be conducted at reasonable hours for the candidate, and documents will be provided in a language understood by the candidate (with translations if necessary).

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e. Data Transfer and Protection: When handling personal data of candidates from outside the UK (especially from the EU, which has GDPR, or other regions with data protection laws), we ensure that international data transfers are lawful. For example, for EU candidates, we rely on the UK's "adequacy" status or standard contractual clauses to transfer data to the UK, in compliance with data protection regulations.

By covering these points, the Company ensures that hiring and contracting practices for EU, US, Asia or any other regions are compliant with local laws and standards, in addition to UK laws. This reduces legal risk and builds trust with international hires.

8. Digital Identity, Website Display, and Financial Conduct

ADD BOOST 360 Limited implements clear guidelines for managing the digital identity of its workforce and ensuring proper financial conduct in all client and third-party interactions. These measures are intended to enhance transparency, bolster security, and prevent fraud, all in compliance with the Data Protection Act 2018 and international data protection standards. Key provisions include:

a. No Physical ID Cards Issued:

The Company does not issue physical identification cards to employees or freelancers. Instead, official identification of personnel is maintained through internal company records and secure verification processes. Staff identity may be confirmed via digital means (such as internal systems or communications), and any public representation of a worker's affiliation is managed through the optional digital profile on the Company's official website (as described below).

b. Optional Digital "Talent Pool" Profile:

Only after verifying a worker's identity through a video interview and obtaining their consent will the Company display a limited digital identity profile for that individual on ADD BOOST 360 Limited's official website (specifically in the "Talent Pool" section). This digital profile will include *only* the individual's full name, their company-issued employee or freelancer identification number, their role or title within the Company, and a professional photograph if one is voluntarily provided by the individual (the photo will be used only after confirming it matches the person during verification). No sensitive personal data or legal identification details (such as passport or national ID numbers) will ever be published as part of this online profile.

c. Consent and Privacy:

Publishing a team member's digital profile on the website is entirely optional and based on the individual's consent. The worker must provide explicit written (or electronic) consent before any personal details are displayed publicly, consistent with the Data Protection Act 2018. A refusal or withdrawal of consent will be respected without any prejudice to the individual's employment or engagement. The Company maintains records of each consent and allows individuals to request removal of or changes to their online profile at any time, ensuring ongoing compliance with privacy rights and international data protection standards.

d. Prohibition of Unauthorized Payments:

All employees and freelancers are strictly prohibited from soliciting or accepting any payment from clients or third parties on behalf of ADD BOOST 360 Limited, unless they have been explicitly authorized in writing by the Company to do so as part of their official duties. Clients must be invoiced and must remit payments **only** through the Company's official channels or accounts, never to individual



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staff directly. Any worker found attempting to collect money outside of these established processes will be subject to serious disciplinary action and potential legal consequences. This rule is in place to prevent fraud and protect both the Company and its clients by ensuring that all financial transactions are transparent, secure, and properly authorized under the Company's oversight.

By implementing these digital identity and financial conduct measures, ADD BOOST 360 Limited upholds transparency in how it showcases and manages its talent, protects personal data in line with the Data Protection Act 2018 and international data protection standards, and actively deters fraudulent activity. These provisions build trust by assuring clients and stakeholders that only verified individuals represent the Company and that all financial dealings are conducted safely through official, monitored channels.

9. Policy Review and Updates

This Recruitment Policy will be reviewed on a regular basis (at least annually) and updated as required to ensure ongoing compliance with UK employment law and relevant international regulations. Changes in legislation, such as amendments to equality law, data protection rules, employment rights, or tax regulations (including IR35 changes), will be reflected in updates to this policy as soon as practicable.

- a. The HR department of ADD BOOST 360 Limited is responsible for monitoring legal developments and best practices in recruitment, and for initiating a policy review when necessary. Any proposed changes to this policy will be submitted to senior management for approval.
- b. If any portion of this policy is found to be in conflict with new laws or regulations, ADD BOOST 360 Limited will comply with the prevailing law and revise the policy accordingly. All managers and staff involved in hiring will be informed of significant changes to the policy, and training or guidance will be provided if needed to implement new requirements.
- c. Communication: The latest version of this Recruitment Policy will be made accessible to all employees (e.g., via the company intranet or employee handbook) and to prospective employees upon request. When the policy is updated, a notice will be issued to all hiring managers and relevant staff, and the "Effective from" date at the top of the policy will be changed to indicate the revision.

By regularly reviewing and updating our Recruitment Policy, ADD BOOST 360 Limited ensures that our hiring practices remain legal, effective, and aligned with the company's values and strategic needs. This document, therefore, represents the current standards and procedures that must be followed in all recruitment activities.