

RECRUITMENT OF EX-OFFENDERS POLICY

for

Maven Securities Holding Limited

and its affiliates

(together “Maven” or “the Company”)

February 2019

1. Definitions

Maven/Company Collectively refers to Maven Securities Holding Ltd & any branches or subsidiaries holding companies or any companies under common control with such holding company (in each case as applicable)

Employee All individuals under a contract of employment of the Company

1. Introduction

This policy shall be made available to all applicants at the start of the recruitment process.

At Maven consideration is given to each applicant's fitness and propriety based on their merits without speculation on an outcome. Maven's assessment will look at:

- Whether the candidate has been open with the Company and disclosed all relevant matters;
- The seriousness of an issue raised, and its relevance to the specific role applied for
- Time since the issue occurred
- Whether the issue relates to an isolated incident, or if a pattern of adverse behaviour is discernible

If there is a suggestion that an individual may not be fit and proper for a particular role, Maven shall consider the full circumstances before deciding any action or decision. If there are concerns, Maven shall provide the candidate with a written statement setting out any of those concerns. This will provide the candidate an opportunity to write to Maven or discuss any issues in person before any decision on hiring is made.

2. General Principles

As an organisation assessing applicants' suitability for positions included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order (using criminal record checks processed through the Disclosure and Barring Service (DBS)), Maven shall use all reasonable efforts to comply with the [code of practice](#) and undertakes to treat all applicants fairly and will follow the guidelines below:

- Maven shall not unfairly discriminate against any subject of a criminal record check on the basis of a conviction or other information revealed
- Maven may ask an individual to provide details of convictions and cautions that Maven are legally entitled to know about, or where a DBS certificate (standard or enhanced) can legally be requested (for example, where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations, as amended)
- Maven may ask an individual about convictions and cautions that are not protected

- Maven is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background
- Maven welcomes applications from a wide range of candidates, without prejudice to those with criminal records
- Maven selects candidates for interview based on their skills, qualifications and experience
- Maven takes reasonable steps to ensure that all those in Maven who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences
- Maven also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974
- Maven shall take reasonable steps to engage in an open and measured discussion on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to the withdrawal of an offer of employment
- Background screening is conducted for all candidates that receive an offer from Maven. UK checks will include credit and standard criminal record checks. Enhanced criminal record checks may be required dependent on the role. Other jurisdictions may vary but candidates will be informed at offer stage what checks will be required. Maven uses a third party criminal records agency for these checks. The checks will be proportionate and relevant to the position concerned
- Maven makes every candidate of a criminal record check submitted to DBS aware of the existence of the [code of practice](#) and shall make a copy available on request; Maven shall discuss any matter revealed on a DBS certificate with the individual seeking the position if it decides to withdraw a conditional offer of employment

3. Disclosure by Applicants

Where the law of England and Wales applies, spent and unspent criminal convictions (other than a protected conviction) and spent and unspent cautions (other than a protected caution) must be disclosed. To determine whether a conviction or caution is protected, refer to the [Rehabilitation of Offenders Act 1974](#) and the [Rehabilitation of Offenders Act 1974 \(Exceptions\) Order 1975](#).

Applicants are expected to disclose a conviction if any of the following apply:

- It is a listed offence
- The application has received a custodial sentence or sentence of service detention
- The applicant has been convicted of other offences in addition to those that do not fit the above circumstances
- If the applicant was under 18 at the time of conviction and less than 5 years and 6 months have passed
- If the applicant was over 18 at the time of conviction and less than 11 years have passed

Applicants are expected to disclose a caution if any of the following apply:

- It was a listed offence
- The applicant was under 18 at the time of the caution and less than 2 years have passed since the caution date
- The applicant was over eighteen at the time of the caution and less than 6 years have passed

Listed offences include serious violent and sexual offences and must be disclosed. The applicant should refer to article 2 paragraph 2A (5)(a) -(n) of the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended by the Rehabilitation of Offenders Act 1974 (Exceptions) (Amendment) Order 2013) for the full definition of 'listed offences'.