



RECRUITMENT OF EX-OFFENDERS POLICY

for

Maven Securities Holding Limited

and its affiliates

(together "Maven" or "the Company")

February 2021

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1. Summary policy statement

This policy outlines:

- the circumstances in which a background check will be conducted and the information which Candidates will be required to disclose;
- how Maven may carry out a risk assessment based on the outcome of a background check; and
- the general principles which Maven adheres to for recruitment purposes.

2. 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 (i) under a contract of employment with the Company, (ii) contract for services or (iii) entering a paid or unpaid work placement.
Candidate	All individuals who have applied to an open position at Maven (in England and Wales) via the Maven website or otherwise.

3. Scope

This policy applies to all Maven entities incorporated in England and Wales. It applies to the recruitment process of Candidates for positions in England and Wales and shall be made available to all Candidates at the start of the recruitment process.

The process in other jurisdictions may vary.

4. Introduction

Maven considers each Candidate's suitability for employment at Maven based on the merits of their application.

A background screening is conducted for all Candidates that receive a conditional offer of employment from Maven. If any adverse information or discrepancies are discovered during the background screening process, either during or prior to the commencement of employment, it will not necessarily prevent a Candidate from being employed by Maven. If an adverse result is returned, Maven will carry out a risk assessment. Maven will take into consideration (amongst other relevant factors):

- whether the Candidate has been forthcoming and disclosed all relevant matters during the recruitment process;
- the significance of any adverse result and its relevance to the specific role concerned;
- the time that has passed since the issue occurred; and
- whether the issue relates to an isolated incident, or if a pattern of adverse behaviour is discernible.

If an adverse result is returned, Maven shall consider the full circumstances before deciding any action. If there are any concerns, Maven shall discuss those concerns with the Candidate and provide the Candidate with a written statement setting out those concerns before deciding whether to withdraw a conditional offer of employment.

5. 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 Candidates fairly and will adhere to the general principles 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 is committed to the fair treatment of its staff or potential staff 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 a criminal record;
- Maven selects candidates for interviews based on their skills, qualifications and experience;
- Maven takes reasonable steps to ensure that all Employees involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences;
- Maven also ensures that Employees 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 screenings are conducted for all Candidates that receive a conditional offer of employment from Maven. The basic DBS check for unspent convictions

applies to all roles unless a DBS certificate at either standard or enhanced level can legally be requested (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 is required to request a standard check for all applicants for a role involving a Senior Manager Function under the [FCA's Senior Managers and Certification Regime](#);
- International criminal record checks are conducted for all Candidates who have lived and/or worked abroad. Such checks will be of an equivalent level in the relevant jurisdiction(s) as the applicable check in England and Wales, to the extent such checks are legally permissible in the relevant local jurisdiction;
- Candidates will be informed of what checks will be required at the offer stage;
- Maven uses a third-party background screening agency for all checks. The checks will be proportionate and relevant to the position concerned.

Maven makes every Candidate of a criminal record check aware of the existence of the [code of practice](#) and shall make a copy available on request.

6. Disclosure by Candidates

Where the law of England and Wales applies:

- If you are required to undertake a basic DBS check:
 - unspent criminal convictions (other than a protected conviction) and unspent cautions (other than a protected caution) must be disclosed.
- If you are required to undertake a standard or enhanced DBS check:
 - unspent and spent criminal convictions (other than a protected conviction) and spent 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](#). To determine whether a conviction or caution is considered spent or unspent, refer to the [Rehabilitation of Offenders Act 1974](#).

Maven encourages Candidates to fully disclose all relevant information to avoid any delays or disruptions to the recruitment process.

Please reach out to recruitment@mavensecurities.com for any questions related to this policy.

7. Status and application

This policy applies to all Maven entities incorporated in England and Wales. This policy may be amended from time to time.