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| Company Name: | Twenty-Four Seven Recruitment Services Ltd | | | | | |
| Policy Name: | Anti-Bribery and Corruption Policy | | | | | |
| Review Date: | V1 undated | V2 23/02/22 | | | | |
| Authorised by: | Amanda Lillis - HR Director | | | | | |

Policy Statement

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery regulations, and to ensure our business is conducted in a socially responsible manner. This policy needs to be read alongside our related policies and procedures where appropriate.

Responsibilities

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all employees comply with it. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate training on it.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

Policy

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct our business in an honest and ethical manner. We take a zero- tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, implementing, and enforcing effective systems to counter bribery.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine and face damage to our reputation. We therefore take our legal responsibilities very seriously.

Scope

In this policy, **third party** means any individual or organisation you meet during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors and business contacts, including their advisors and representatives. All arrangements with third parties should be subject to clear contractual terms and procedures in relation to bribery and corruption.

This policy applies to all employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, casual workers and agency staff, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **employees** in this policy). This policy covers:

- Bribes;
- gifts and hospitality;

- Political contributions; and,
- charitable contributions.

Bribes

Employees/Workers must not engage in any form of bribery, either directly or through any third party (such as a client or business partner).

Offering Gifts and hospitality

Employees may not, directly or through others, offer or give any, money, gift, hospitality, or other thing of value to an official, employee or representative of any supplier, customer or any other organisation, doing so could give the appearance of influencing the organisation's relationship with Twenty-Four Seven. Staff may:

- Give gifts of a nominal value;
- With management approval, provide meals and other entertainment provided that the expenses are kept at a reasonable level; and,
- Provide meals and overnight accommodation where these are reasonable and in the normal course of Company business or events.

Receiving gifts and hospitality

An employee/worker or any member of their family should not, directly or through others, solicit or accept money, gifts, hospitality, or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.

Gifts or hospitality may not be accepted, irrespective of value, which might influence or be seen to influence such situations as the outcome of the award of business (contract), or to benefit personally or for the benefit of any person connected to that person.

Unless you have been informed otherwise you may accept:

- a gift of nominal value, such as an advertising novelty, when it is customarily offered to others having a similar relationship with that individual or organisation;
- customary meals or entertainment provided that the expenses are kept at a reasonable level.

If an excessive gift or hospitality is found to have been accepted, then your manager will discuss the circumstances with you and agree how to deal with it e.g., a gift can be returned, or steps can be taken to ensure that the acceptance of hospitality does not influence a decision or situation in favour of the giver.

If excessive gift(s) or hospitality are accepted on more than one occasion or are found to have influenced decisions inappropriately, against Company policy (or potentially illegally), then appropriate disciplinary procedures will followed.

Political contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged). However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation on behalf of the Company must be offered or made without the prior approval of a senior manager.

Record-keeping

You must declare and keep a written record of all gifts accepted or offered, which will be subject to management review.

You must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy.

How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager or director. If you feel you cannot raise it with any of the above, then please refer to our *Whistleblowing Policy*.

What to do if you are a victim of bribery or corruption

It is important that you tell your line manager or director as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. *For further info, please view the Whistleblowing Policy*

Training and communication

Training on this policy should form part of the induction process for all new employees. All existing employees should receive relevant training on how to adhere to this policy.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, clients, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter. Please refer to the Bribery Act Policy Statement.

Monitor and review

The Company's HR Director has primary responsibility for ensuring compliance with this Policy and will review its contents on a regular basis. They will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the Executive and Board Directors of the Company who have overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations.

Sanctions and non compliance

A breach of any of the provisions of this Policy by any Relevant Person who is an officer or employee of the Company will constitute a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal without payment of notice.

Breach of this policy by any Relevant Person who is a temporary worker, contractor or consultant providing his/her services to the Company may lead to the immediate termination of that temporary workers, contractor's, or consultant's engagement by the Company.

Breach of this policy by any Relevant Person which is a corporate entity could lead to the suspension or termination of any relevant contract, sub-contract or other agreement between the corporate entity and the Company.