

Anti-Bribery and Corruption Policy

1. Purpose

The purpose of this Anti-Bribery and Corruption Policy is to ensure that Ultimate Recruitment maintains the highest ethical standards in its business operations. This policy outlines our commitment to preventing bribery and corruption in any form and provides clear guidelines on acceptable and prohibited gifts and hospitality, as well as the responsibilities of all employees, agents, suppliers, and business partners.

2. Scope

This policy applies to all employees, officers, directors, agents, consultants, contractors, suppliers, and any third parties associated with Ultimate Recruitment. It covers all activities within the business, including recruitment practices, client interactions, supplier relationships, and other business dealings.

3. Definition of Bribery and Corruption

- **Bribery** is offering, giving, receiving, or soliciting anything of value with the intention of influencing the actions or decisions of another party in an improper way.
- **Corruption** is the abuse of entrusted power for personal gain, including actions such as bribery, fraud, or extortion. Ultimate Recruitment has a zero-tolerance policy toward bribery and corruption, whether it involves public officials, private sector employees, or business partners.

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4. Prohibited Conduct

Ultimate Recruitment strictly prohibits the following:

- **Offering or accepting bribes:** Employees and third parties are prohibited from offering, accepting, or soliciting bribes in any form, whether directly or indirectly.
- **Facilitation payments:** No employee, contractor, or third-party supplier is permitted to make or accept facilitation payments (small bribes made to expedite services or actions that are part of normal business operations).
- **Kickbacks:** Any form of kickbacks or hidden commissions for the benefit of employees, contractors, or agents are strictly prohibited.
- **Gifts and entertainment:** Employees are prohibited from offering or accepting gifts, hospitality, or entertainment that could be construed as a bribe or an attempt to influence business decisions.

5. Acceptable Gifts and Hospitality

Ultimate Recruitment recognises that there are occasions when it is customary and appropriate to offer or receive gifts and hospitality as part of building and maintaining business relationships. However, these must

be in line with the principles of transparency, fairness, and integrity, and not intended to influence business decisions.

5.1. Acceptable Gifts

- **Reasonable value:** Gifts should not exceed a value of £50 (or equivalent). Gifts exceeding this amount should be disclosed to the employee's manager or the Human Resources department for review.
- **Corporate items:** Gifts that are branded with the company's logo, such as pens, notepads, or calendars, are acceptable if they are of nominal value and used for business purposes.
- **Occasional token gifts:** Small, non-monetary tokens of appreciation, such as birthday cards, holiday cards, or flowers, are acceptable in the context of a personal relationship and should not exceed a modest value.

5.2. Acceptable Hospitality

- **Low-value meals:** Reasonable meals or refreshments may be offered or accepted in connection with legitimate business meetings. For example, lunch or dinner within normal working hours is acceptable, provided that it is modest in value and not designed to influence decisions.
- **Conferences and events:** Attending business-related conferences, seminars, or events that involve minimal hospitality or entertainment may be acceptable, provided that they are in line with the company's business objectives and are not excessive.

5.3. Other Acceptable Gifts or Hospitality

- **Charitable donations:** Gifts or contributions made directly to a charity on behalf of the company, and not linked to any personal benefit or favour, are acceptable.
- **Public events:** Invitations to attend public events (sports, concerts, or cultural events) where the purpose is related to business networking and not personal gain.

6. Prohibited Gifts and Hospitality

Certain types of gifts and hospitality are never acceptable, regardless of the value, and are strictly prohibited by Ultimate Recruitment:

6.1. Prohibited Gifts

- **Cash or cash equivalents:** Employees are never allowed to accept or offer cash gifts, loans, or items with a value equivalent to cash (e.g., gift cards, vouchers).
- **Excessively valuable gifts:** Gifts with a value exceeding £50 (or equivalent), or those that appear to be intended to influence decision-making, are prohibited.
- **Personal gifts:** Gifts that are personal in nature (e.g., jewellery, holidays, expensive personal items) are not acceptable under any circumstances.
- **Gifts tied to specific outcomes:** Any gift given with the expectation of receiving favourable treatment, preferential decisions, or advantages is considered a bribe and is strictly prohibited.

6.2. Prohibited Hospitality

- **Extravagant or lavish meals:** Any meal or entertainment that is excessive, such as luxurious dinners, exclusive events, or entertainment not related to the business purpose, is prohibited.
- **Frequent or lavish travel:** Offering or accepting travel, hotel stays, or recreational activities beyond what is necessary for legitimate business purposes is prohibited.
- **Hospitality with no clear business purpose:** Any hospitality or entertainment that cannot be reasonably justified as part of a genuine business relationship or is likely to influence business decisions is prohibited.

7. Reporting Gifts and Hospitality

Employees must adhere to the following procedures when offering or receiving gifts or hospitality:

- **Disclosure:** Any gift or hospitality received or offered above a nominal value (i.e., over £50) must be reported to the employee's immediate supervisor or the HR department for review. This ensures transparency and allows the company to evaluate whether the gift or hospitality could be perceived as an attempt to influence business decisions.
- **Approval:** Gifts or hospitality exceeding £50 should only be accepted if explicitly approved by a manager or the HR department. Employees must seek approval before accepting or offering such gifts.
- **Documentation:** Employees should maintain records of any gifts or hospitality offered or received, including details of the giver/receiver, value, and business context.

8. Responsibilities

8.1. Employees

Employees of Ultimate Recruitment are responsible for:

- Familiarising themselves with and adhering to this Anti-Bribery and Corruption Policy.
- Reporting any concerns or violations of the policy to their manager or through the company's whistleblowing procedure.
- Rejecting any gifts or hospitality that are not in compliance with this policy.

8.2. Managers

Managers are responsible for:

- Ensuring that their team members understand and comply with this policy.
- Reviewing and approving any gifts or hospitality above the acceptable value.
- Addressing any potential violations and reporting them to the relevant authorities when necessary.

9. Consequences of Non-Compliance

Failure to comply with this policy may result in disciplinary action, including termination of employment. Ultimate Recruitment takes violations of the Anti-Bribery and Corruption Policy seriously, and legal actions may also be taken where applicable, including reporting the incident to regulatory authorities.



10. Review and Updates

This policy will be reviewed annually to ensure its effectiveness and alignment with applicable laws and best practices. Any changes to this policy will be communicated to all employees, suppliers, and business partners.

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