



Anti-Bribery & Corruption Policy

1. Introduction

It is Platinum Recruitment Consultancy's policy to conduct its business in an honest and ethical manner. Platinum Recruitment Consultancy takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever Platinum Recruitment Consultancy operates.

Platinum Recruitment Consultancy will uphold all laws relevant to countering bribery and corruption including the Bribery Act 2010 ('the Act'), in respect of its conduct both at home and abroad.

2. The purpose

The purpose of this policy is:

- To set out the responsibilities of Platinum Recruitment Consultancy, and of those working for it, in observing and upholding our position on bribery and corruption; and
- To provide information and guidance to those working for Platinum Recruitment Consultancy on how to recognize and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if Platinum Recruitment Consultancy is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to its reputation. Platinum Recruitment Consultancy therefore takes its legal responsibilities very seriously.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for Platinum Recruitment Consultancy, and includes temporary workers, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies.

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References in this policy to obtaining written approval includes obtaining approval by e-mail.

3. Who is covered by the Policy?

This policy applies to all individuals working at all levels and grades, and includes all employees (whether permanent, fixed-term or temporary), contractors, trainees, casual workers and agency staff, volunteers or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as workers in this policy), The Act applies to conduct both within and outside the UK.

4. What is Bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. At the end of this document there is a schedule setting out some scenarios that illustrate potential bribery.

5. Gifts and Hospitality

In addition to the requirements set out below, you must register any gifts or hospitality given or received with an estimated value in excess of £100 with either your Line Manager or responsible person. The details of how to do this are set out below. Further, you must obtain the written approval (which includes by e-mail) of your line manager in relation to any gifts or hospitality given or received with an estimated monetary value in excess of £500.

Platinum Recruitment Consultancy recognises that the practice of the giving and receiving of business gifts or hospitality varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift or hospitality should always be considered.

6. Gifts

The giving or receipt of gifts is not prohibited, if the following requirements are met:

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- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it is given in Platinum Recruitment Consultancy's name, not in your name.
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and it is given openly, not secretly.

7. What is not acceptable?

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that either a personal or business advantage will be received, or to reward either a personal or business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain either a personal or business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that either a personal or business advantage will be provided by Platinum Recruitment Consultancy in return.
- turn a blind eye to any of the above;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or engage in any activity that might lead to a breach of this policy.

8. Donations

We do not make any contributions to political parties.

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9. Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties, for the purposes of establishing or maintaining good business relationships or improving or maintaining our reputation or image.

10. Your Responsibilities

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Platinum Recruitment Consultancy or under its

control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

11. Record Keeping

Platinum Recruitment Consultancy must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

If you are required to register a gift or hospitality under this policy you must complete the Gifts and Hospitality Registration form and send it your Line Manager who will maintain a Register of Gifts and Hospitality (which can consist of storing the forms electronically). You must register any gift or hospitality within 28 days. Requests to your line manager for written approval (which includes by e-mail) of gifts or hospitality must be submitted in advance where possible to allow time for a decision to be made.

You must ensure that all claims relating to hospitality and gifts and other payments to third parties are submitted in accordance with the relevant policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be

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prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

12. Who is responsible for the policy?

Platinum Recruitment Consultancy has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under Platinum Recruitment Consultancy's control comply with it.

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