

Our Policy Statement

One of the Company's core values is to uphold responsible and fair business practice. It is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. Its reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. The Company therefore has **a zero tolerance policy towards bribery and corruption** and is committed to acting fairly and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems to counter bribery.

Definitions

In this policy "we", "us", and "the Company" mean R Recruitment Limited.

"Bribe" means an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage; "to Bribe" and "Bribery" are construed accordingly.

"Relevant Person" means any individual (whether an officer or employee of the Company, or a temporary worker, contractor or consultant providing services to or on behalf of the Company) or any corporate entity who performs functions for or on behalf of the Company.

Who does it apply to?

All Relevant Persons are expected to adhere to the principles set out in this Policy.

1. Policy Principles

All Relevant Persons and Associated Persons are required at all times;

- Not to commit an offence listed within this policy or any other offence;
- To comply with the Bribery Act;
- To act honestly, responsibly and with integrity; and,
- To safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a Bribe.

All Relevant Persons and all Associated Persons are expected to adhere strictly at all times to the guidelines set out in this Policy. If you are in doubt as to what might amount to bribery or what might constitute a breach of this Policy, refer the matter to Renata@rragency.co.uk

2. The Bribery Act 2010

The Bribery Act 2010 (the Bribery Act) came into force on 1 July 2011. The Bribery Act affects the Company in its business relations anywhere in the world.

Under the Bribery Act it is an offence to:

- Bribe a person i.e. to offer or give a financial or other advantage to another person, whether within the UK or abroad, with the intention of inducing or rewarding improper conduct;
- Receive a Bribe i.e. to request, agree to receive or accept a financial or other advantage for or in relation to improper conduct;

- Bribe a foreign public official; and
- Fail to prevent Bribery

3. Risks of not acting with integrity

Involvement in Bribery or corruption carries many risks. Among them are:

- A company which pays or accepts Bribes is not in control of its business and is at risk of blackmail;
- If the Company is found guilty of Bribery or even of failing to have adequate procedures in place to prevent Bribery, it will be subject to unlimited fines;
- Any person found guilty of Bribery will be subject to fines and/or imprisonment of up to 10 years;
- A public exposure, or even allegation of bribery would entail severe reputational damage. The Company's banking or supply facilities might be withdrawn or be available on much less favourable terms;
- The cost of our insurance could increase significantly; and
- Good people will not want to work for us.

4. Benefits of acting with integrity

Equally, there are very clear benefits to acting with propriety. These include:

- We increase our chances of being selected as a supplier for any tenders;
- We remain in good standing with our banks and our own suppliers and they will want to continue doing business with us; and
- A business with high ethical standards is a good place to work.

5. Gifts and Hospitality

The Company occasionally provides gifts and hospitality to clients, customers, contractors, and suppliers. This is not prohibited by the Bribery Act provided the following requirements are met:

- The gift 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;
- It complies with local laws;
- It is given in the Company's name, not in the giver's personal name;
- It does not include cash or a cash equivalent (such as gift vouchers)
- It is given openly, not secretly;
- It is approved in advance by a director of the Company;

In summary, it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

6. What are the indicators of bribery?

Common indicators of corruption include those listed below. There may well be others. For example:

- Payments are for abnormal amounts (e.g. commission), or made in an unusual way, e.g. what would normally be a single payment is made in stages, through a bank account never previously used, or in currency or via a country which has no connection with the transaction;

- Process is bypassed for approval or sign-off of terms or submission of tender documents, payments, or other commercial matters;
- Individuals are secretive about certain matters or relationships and/or insist on dealing with them personally. They may make trips at short notice without explanation, or have a more lavish lifestyle than expected;
- Decisions are taken for which there is no clear rationale;
- Records are incomplete or missing.

7. Political Contributions

We do not make donations to political parties. No individual is to make a donation stated to be, or which could be taken to be, on our behalf without prior approval of the Board. You may, of course, make political donations in a personal capacity but please be sensitive to how such contributions could be perceived, especially by those who are aware of your connection with the Company.

8. Charitable Donations

Bribers may even be disguised as charitable donations. Again, for that reason, donations we make are approved by resolution of the Board and recorded. Whilst individuals may of course make personal donations to charity, they should not do so on behalf of the Company without prior approval from the Board.

9. Local Circumstances

We understand that different parts of the world have different social and cultural customs. This does not affect our position that we do not pay or accept bribes or act corruptly: we do not and will not. However, subject to that positions, we understand the need to be sensitive to local customs. For example, there are cultures in which refusing (or even failing to offer) a gift is considered impolite, and could alienate a key contact. In such cases, please refer to info@rragency.co.uk

10. Responsibility to report and the reporting procedure

All Relevant Persons are contractually required to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected Bribery or corruption. If you know or suspect that any Relevant Person plans to offer, promise or give a Bribe or to request, agree to receive or accept a Bribe in connection with the Company's business, you must disclose this to info@rragency.co.uk as quickly as possible to allow appropriate action to be taken promptly.

10.1 The Company is committed to taking appropriate action against Bribery and corruption. This may include either reporting the matter to an appropriate external government department, regulatory agency or the police.

11. Record Keeping

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No amounts must be kept "off the record" to facilitate or conceal improper payments.

12. Training

The Company will provide training to all employees to help them understand their duties and responsibilities under this Policy. The Company's zero tolerance approach to Bribery will also be made available to all business partners.

13. Failure to Comply

A breach of any of the provisions of this Policy by any Relevant Persons who is an employee of the Company will constitute a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure and may be treated as gross misconduct and could render the employee liable to dismissal without lieu of pay.

Breach of this Policy by any Relevant Person who is a temporary worker or contractor providing his/her services to the Company may lead to the immediate termination of their 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.

14. Review of Policy

R Recruitment may review this policy from time to time and when required in line with legislative changes.