

## **Anti-Bribery & Corruption Policy**

**\*\*This is an abridged version of our Anti-Corruption and Bribery Policy\*\***

### **Introduction**

It is Willow Recruitment London Ltd's policy to conduct its business in an honest and ethical manner. Willow Recruitment London Ltd 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 Willow Recruitment London Ltd operates.

Willow Recruitment London Ltd 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.

### **The Purpose**

The Firm will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it conducts business, including, in the UK, the Bribery Act 2010 (the **Act**), which applies to conduct both in the UK and abroad.

### **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.

### **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.

### **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.

Willow Recruitment London Ltd recognises that the practice of the giving and receiving of business

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.

### **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.

### **Gifts**

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

- 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 Willow Recruitment London Ltd'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.

### **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 Willow Recruitment London Ltd 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.

### **Donations**

We do not make any contributions to political parties.

### **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 Willow Recruitment London Ltd or under its control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Any Workers 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.

If any Third Party is aware of any activity by any Worker which might lead to, or suggest, a breach of this Policy, they should raise their concerns with the Firm's Director of Willow Recruitment, Jith, at [jith@willowrecruitment.co.uk](mailto:jith@willowrecruitment.co.uk) the first instance.

### **Record Keeping**

We keep appropriate financial records and have appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

### **Training and communication**

Training on this Policy is provided for all Workers and our zero-tolerance approach to bribery and corruption will, where appropriate, be communicated to clients, suppliers, contractors and business partners.

### **Monitoring and review**

The Firm monitors the effectiveness and reviews the implementation of this Policy at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in countering any risks of bribery and corruption.

All Workers are aware that they are responsible for the success of this Policy and should ensure they use it to disclose any suspected danger or wrongdoing.

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