



## **ANTI-BRIBERY AND CORRUPTION POLICY**

### **POLICY STATEMENT**

To establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that M. Aria Recruitment Limited's business is conducted in a socially responsible manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.

We will uphold all laws relevant to countering bribery and corruption in the jurisdictions in which we operate. However, we remain bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

### ***Purpose***

To set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years; imprisonment and/or a fine. As an employer if we fail to prevent bribery we can face an unlimited fine, exclusion from tendering for public contracts, and damage to our reputation. We therefore take our legal responsibilities very seriously.

In this Policy, third party means any individual or organisation we come into contact with during the course of our work and includes actual and potential clients, candidates, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

### **Who must comply with this policy?**

This policy applies to all persons working directly for Lynne Hargreaves Associates Limited or on its behalf in any capacity, including employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners, sponsors, or any other person associated with the firm, wherever located (collectively referred to as “workers” in this Policy).

### **Defining and explaining bribery and corruption**

Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

An advantage includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

A person acts improperly where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts maybe in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.

Corruption is the abuse of entrusted power or position for private gain.

### **Examples:**

#### *Offering a bribe*

You offer a potential client tickets to a major sporting event, but only if they agree to do business with Lynne Hargreaves Associates Limited.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business. It may also be an offence for the potential client to accept *your offer*.

### *Receiving a bribe*

A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

### **What you must not do**

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 a business advantage will be received, or to reward a business advantage already given;
- give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
- accept a payment, gift or hospitality from a third party that you know or suspect is offered
- with the expectation that it will provide a business advantage for them or anyone else in return;
- accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;
- offer or accept a gift to or from government officials or representatives, or politicians or political parties, without the prior approval of your Director;
- 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 other activity that might lead to a breach of this policy.

### ***Gifts, Hospitality and Expenses***

This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:

- establishing or maintaining good business relationships;

- improving or maintaining our image or reputation; or
- marketing or presenting our products and/or services effectively.

**The giving and accepting of gifts is allowed 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 our 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, taking account of the reason for the gift, its timing and value. For example, in the UK it is customary for small gifts to be given at Christmas; and it is given openly, not secretly;
- it complies with any applicable local law.

***Additionally:***

- All offers of gifts to and from Clients with a monetary value of £50 or more must be notified to a Director for approval
- All offers of Corporate Entertainment/Hospitality to and from Clients or counterparties with a monetary value of £50 or more must be notified to a director for approval
- Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable
- Reimbursing a third party's expenses, or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery
- However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

We appreciate that practice 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, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered.

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