

Anti-Bribery and Corruption Policy

1. Definitions

In this policy “we”, “us” and “PureKat” mean PureKat Consultancy Ltd.

“*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 PureKat, a temporary worker, contractor or consultant providing services to or on behalf of PureKat) or any corporate entity that performs functions for or on behalf of PureKat.

2. Introduction

One of PureKat’s core values is to uphold responsible and fair business practice. PureKat 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. PureKat therefore has **a zero tolerance approach towards bribery and corruption**. We are committed to acting fairly and with integrity in all of our business dealings and relationships, and to implementing and enforcing effective systems to counter bribery.

3. Purpose and scope of this policy

This Policy sets out the steps all of us must take to prevent bribery and corruption in our business and to comply with relevant legislation. It is aimed at -

- ensuring compliance with anti-bribery laws, rules and regulations, both within the UK and in any other country which PureKat may, in future, carry out its business or in relation to which its business may be connected
- enabling any Relevant Person to understand the risks associated with bribery and to encourage them to be vigilant and recognise, prevent and report any wrongdoing, whether by themselves or others
- providing suitable and secure reporting and communication channels and ensuring that any reported information is properly dealt with
- implementing an effective framework for dealing with any suspected instances of bribery or corruption.

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

4. The UK Bribery Act 2010

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

Under the Act it is an offence to -

- bribe a 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
- fail to prevent bribery.

Perfection in recruitment

PureKat Consultancy Ltd

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5. Risks of not acting with integrity

Involvement in bribery or corruption carries many risks. Among them are -

- a company that pays or accepts bribes is not in control of its business and is at risk of blackmail
- if PureKat 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. PureKat's banking or supply facilities could be withdrawn or be available on much less favourable terms, and PureKat could be blacklisted as an approved supplier in both public and private sectors
- the cost of our insurance cover could increase very significantly
- good people will not want to work for or with us.

6. Benefits of acting with integrity

Equally, there are very clear benefits to acting ethically and with propriety. These include -

- increasing our chances of being chosen as a supplier in both the public and private sectors
- we remain in good standing with our banks and our own suppliers and they will want to keep doing business with us
- a business with high ethical standards is a good place to work
- it is a requirement of the REC Code of Professional Practice that we act with integrity at all times.

7. Policy statement

All Relevant Persons are required at all times -

- not to commit an offence listed above at Section 4, The UK Bribery Act 2010, or any other offence
- to comply with the Act and any other anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they or PureKat might conduct business
- to act honestly, responsibly and with integrity
- to safeguard and uphold PureKat'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 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 PureKat's Managing Director.

8. Gifts and Hospitality

PureKat may occasionally provide gifts and/or hospitality to clients, customers, contractors, and suppliers. This is not prohibited by the Act provided certain requirements are met.

This Policy also covers the receipt of gifts, hospitality or expenses to ensure that any legitimate transactions are recorded and do not improperly affect the outcome of procurement, application or any other business transaction.

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PureKat forbids any Relevant Person from soliciting any gift or hospitality in the course of his/her employment or engagement with PureKat or, if a corporate entity, for the duration of any contract between that corporate entity and PureKat.

PureKat forbids any Relevant Person from offering or receiving any gift or hospitality that is in breach of relevant law.

Conditions under which the receipt or provision of gifts, hospitality are acceptable -

- the gift is not made with the intention of influencing or rewarding the provision or retention of business or business advantage
- the gift is given in PureKat's name, not in the giver's personal name
- the gift does not include cash or a cash equivalent (such as gift vouchers)
- the gift is of an appropriate and reasonable type and value and given at an appropriate time
- the gift is given openly, not secretly
- the gift is approved in advance by PureKat's Managing Director
- details of all gifts and hospitality, made or received, that are permitted under this policy are recorded in a register maintained by PureKat's Managing Director.

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. Neither is it acceptable to receive 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.

9. Facilitation payments

Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited by PureKat. Facilitation payments are not commonly paid in the UK but they are common in some other jurisdictions.

10. What are the indicators of bribery?

Some common indicators of corruption are listed below. (This list is not exhaustive and there may well be others.) -

- payments are for abnormal amounts (e.g. commission), or made in an unusual way, e.g. normally a single payment is made in stages or through a bank account not previously used
- a process is bypassed e.g. approval or sign-off of terms, submission of tender documents, payments, or other commercial matters
- those whose job it is to monitor commercial processes within a company, (e.g. Internal Audit), may be prevented from or hindered in doing so
- individuals are secretive about certain matters or relationships and/or insist on dealing with them personally
- decisions are taken for which there is no clear rationale
- records are incomplete or missing.

11. Political contributions

Be aware that such contributions can be (or be seen as) bribes in disguise. We do not donate to political parties. No individual is to make a donation stated to be, or which could be taken to be, on our behalf without the prior approval of PureKat's Managing Director.

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 PureKat.

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12. Charitable donations

Bribes may even be disguised as charitable donations. For that reason, donations we make, e.g. sponsorship of charitable events, are approved by PureKat's Managing Director and recorded.

Whilst individuals may of course donate to charity, they should not do so on behalf of PureKat without prior approval from PureKat's Managing Director.

13. Local circumstances

We understand that different parts of the world have different social and cultural customs. This does not affect PureKat's position at present as we do not do business outside the UK and we do not pay or accept bribes or act corruptly. However, subject to that position, we understand the need to be sensitive to local customs should we, in future, do business internationally. For example, there are cultures in which refusing (or even failing to offer) a gift is considered impolite, and could alienate a key contact. Should any such cases arise please refer to PureKat's Managing Director who will be responsible for establishing variations to this Policy.

14. Exceptional circumstances

In some extreme and unlikely circumstances a payment is justifiable. If one of our people is faced with a threat to his or her personal safety or that of another person if a payment is not made, they should pay it without fear of recrimination. In such cases, however, PureKat's Managing Director must be contacted as soon as possible, and the payment and the circumstances in which it was made must be fully documented and reported.

15. 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. All Relevant Persons have a duty to prevent, detect and report any incident of bribery and any potential risks of bribery. If you know or suspect that any Relevant Person plans to –

- offer, promise or give a bribe
- request, agree to receive or accept a bribe

in connection with PureKat's business, you must disclose this to PureKat's Managing Director as quickly as possible to allow appropriate action to be taken promptly.

PureKat is committed to taking appropriate action against bribery and corruption. This may include reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with Relevant Persons.

PureKat will keep your disclosure confidential during any investigation it undertakes to the extent that this is practical and appropriate in the circumstances. PureKat will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. PureKat is also committed to ensuring nobody suffers any detrimental treatment as a result of –

- refusing to take part in bribery or corruption
- reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place. or may take place in the future

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- assisting in the investigation of an allegation of bribery or corruption.

16. 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 accounts must be kept “off the record” to facilitate or conceal improper payments.

17. Monitoring compliance

PureKat’s Managing Director has primary responsibility for ensuring compliance with the Policy and its contents will be reviewed on a regular basis. She will be responsible for monitoring its effectiveness in complying with PureKat’s legal and ethical obligations.

18. Training

PureKat will provide training to all employees to help them understand their duties and responsibilities under this Policy. PureKat’s zero tolerance approach to bribery will also be communicated to all business partners at the outset of the business relationship with them and as appropriate thereafter.

19. Sanctions for breach of this Policy

A breach of any of the provisions of this Policy by any Relevant Person who is an officer or employee of PureKat will constitute a disciplinary offence. Depending on the gravity of the offence, it may be treated as gross misconduct and it could render the officer or employee liable to summary dismissal.

Breach of this policy by any Relevant Person who is a temporary worker, contractor or consultant providing his/her services to PureKat may lead to the immediate termination of that person’s engagement by PureKat.

Breach of this policy by any Relevant Person that 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 PureKat.

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