



PEOPLE CONNECTORS

SUCCEEDING THROUGH PARTNERSHIP

Anti-Bribery Policy

Our Commitment

The owners and management of People Connectors Limited are committed to preventing bribery by persons associated with it. We foster a culture within the organisation in which bribery is never acceptable. We recognise that there are bribery risks within our industry and we have taken active steps to educate staff of the risks, monitor compliance in all our activities and foster a culture of zero tolerance of bribery.

Terminology

Bribery: “Very generally, this is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.”

Responsibilities

- A director and management are responsible for defining and reviewing this policy to ensure that it addresses the bribery risks.
- The management of People Connectors Limited must ensure that each individual that they manage and all new recruits are given an introduction to this policy.
- All employees must read and take appropriate action to ensure that this policy is implemented and must raise a query with management or a director if any activity by People Connectors Limited staff or companies or individuals associated with People Connectors Limited gives concern that it might not be consistent with this policy or the law. People Connectors Limited is an open and transparent company and a director and management will take all queries seriously.

An Assessment Of The Bribery Risks In The Recruitment Industry

- Selection of incompetent agencies by employer managers in return for remuneration or other incentives,
- Prejudicial agreements (e.g. with excessive rates or charges) entered into by employer managers in return for remuneration or other incentives from recruitment agencies,
- Employers or Recruitment Agencies may encounter vacancy applicants with fraudulent Curriculum Vitae (CV) (using false academic credentials/experience certificates) to obtain employment and may offer incentives to staff so that their CV and credentials are not thoroughly checked.
- Direct applicants to an employer may be routed through a recruitment agency in exchange for a referral fee/incentive to referrer at the potential employer.
- Contract recruitment consultants referring applicants to umbrella companies in exchange for a referral fee provides the potential scope to fall foul of the Bribery Act 2010 where there is little or no statutory requirement for transparency. This does not preclude the referral of candidates to umbrella companies but company procedures must ensure transparency and no impropriety.



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- The giving or receiving of gifts by staff and management that could be considered to be an inducement to act improperly has a risk of being caught by the Bribery Act 2010. This requires that organisations set clear guidance on the giving and receipt of gifts.
- Client entertainment or hospitality that is not considered “reasonable and proportionate” has a risk of being caught by the Bribery Act 2010.
- Charitable donations may in some situations be considered improper inducements where the donation is intended to induce the charity or another party to act improperly. Charitable donations need to be subject to clear guidance to avoid transgressing the Bribery Act 2010.

[An Assessment Of The Bribery Risks In People Connectors Limited](#)

People Connectors Limited provide contract and permanent recruitment services in the IT sector and as such may be exposed to any of the risks that apply to the recruitment industry. Consequently, the strategy for People Connectors commitment to preventing bribery is articulated in the Policy Guidance below.

[Anti-Bribery Policy Guidance](#)

[Referral Fees From Service Providers:](#)

Referral fees paid by umbrella companies, insurance providers, legal advisers and specialist contract reviewers and other suppliers of services to individuals and companies seeking work through recruitment agencies and employment businesses are not uncommon. The Bribery Act 2010 and previous legislation does not make referral fees illegal however where People Connectors Limited employees refer these services to an individual or company the following procedure must be followed:

1. Do not enter into any referral fee agreement without the permission of a director.
2. When a referral fee is offered by a supplier consider whether it is proportionate to the business that has been referred. If you are unsure refer it to your manager.
3. All referral fee agreements must be made in writing and copied to accounts@peopleconnectors.co.uk.
4. When advising an individual of the services provided by another supplier, clearly disclose that a fee would be paid for a referral, if applicable.
5. Do not accept a cash payment in respect of referral fees. These must be paid directly to People Connectors Ltd as a cheque or electronic payment and never to an employee.
6. Payment receipts in the accounting records must be marked as referral fees and show the name(s) of the contractor(s).
7. Do not accept any gift, vouchers, corporate hospitality or entertainment in respect of referral fees.



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Preferred Supplier Agreements, Contracts and And Terms Of Business:

The contracts and agreements that are made with the clients of People Connectors must be written down and reviewed by a director.

All such contracts and agreements:

1. Must be written down and sent to a director and the senior accounts manager.
2. Must show all applicable fees, rebates and charges and the method for the calculation of those charges and the conditions under which payments are made.
3. Must only provide for payments to parties that are signatures of the agreement.
4. Must ensure that all payments made and received are clearly recorded in the accounts and are fully traceable to the reason for the payment.
5. Must only be signed by a director.

All such contracts and agreements must not:

1. Provide any inducement for any person or company to perform functions or activities improperly or provide any inducement for any person or company to neglect to perform the proper functions or activities.

Promotional Gifts

We will not provide gifts to any client, contractor, supplier, or other third party with the intention of persuading the recipient to act improperly, or where that intention might be perceived by the recipient.

This policy does not prohibit employees from accepting promotional gifts of low value (i.e. pens, & calendars), whether given to them personally, or received through the post, unless the employee regards the gift (including the accumulation of a series of low value gifts), as an inducement or reward for improper performance. Employees must obtain authorisation from their line manager before giving any such gift to any recipient. Where promotional gifts of a higher value, or other gifts, are received either personally, or through the post, the employee must immediately make their Line Manager or a Director aware that they have received the gift. The Line Manager or a Director may discuss the circumstances with the employee, and will make a determination as to whether the gift could be considered as an inducement or reward for improper performance, and will decide whether or not the gift should be accepted or returned.

No employee shall offer any gift, corporate hospitality or entertainment to any public official in the UK or abroad.

We may from time to time provide employees with promotional gifts of low value for distribution to clients, contractors, or other relevant third parties, in line with accepted industry marketing practices. Employees may not provide any client, contractor, supplier, or other third party with any gift with a value greater than £10 without the express permission of Line Manager or a Director.



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Corporate Hospitality & Entertainment

We will not provide corporate hospitality or entertainment to any client, contractor, supplier, or other third party with the intention of persuading the recipient to act improperly. Corporate hospitality and entertainment may include drinks, meals, invitations to events, functions, or other social gatherings, in connection with matters relating to our business. Such hospitality or entertainment may be acceptable as long as it is reasonable, and proportionate, and has a legitimate business aim. Employees may provide corporate hospitality or entertainment to their clients, contractors, or other relevant third parties where:

1. the employee requests from their line manager to provide entertainment, and the line manager gives approval for the expenditure, which will be decided on a case by case basis dependent upon the circumstances. The employee's request will include at least: details of the recipient; when the recipient was last met or entertained by the company; and the intended venue and budget for the entertainment.
2. the sole purpose for such entertainment is to build the professional relationship between the employee/us and the recipient/the business they represent;
3. the entertainment is not likely, when acting reasonably, to be perceived by the employee, the recipient, or any third as influencing a business decision or inducing improper performance;
4. the entertainment is offered only to bona fide representatives of the receiving organisation, and does not include invitations to persons connected to the recipient who are not directly involved in the recipient's business (i.e. members of the recipient's family unconnected with their business);
5. the invitation is made openly with no attempt of concealment from other members of the recipient's organisation; or
6. the timing of the invitation or entertainment is not linked to any particular decision or major sales opportunity of the recipient. For example, hospitality should not be arranged to deliberately take place just before a major project is awarded, or a client performance review. Employees should ask themselves "Does this feel right, or am I expecting some business-related reward or advantage to come out of this entertainment?" All corporate hospitality or entertainment must be agreed in advance, in writing by a line manager. Such entertainment shall only be provided where the line manager feels that it is in line with industry standards, and it meets the criteria laid out in points 2 to 6, above.

Where an employee is offered hospitality or entertainment by a supplier or other third party, they must:

- gain consent to attend such entertainment by their line manager or Director; provide the line manager or Director with an honest and transparent description of the entertainment and the circumstances under which it is being offered; and
- ensure that it complies in principle with the criteria laid out in points 2 to 6 above.

Charitable Donations

The company is committed to a social policy, which includes at times donating money to charity, or providing services free of charge or at a greatly reduced price. Before any employee makes any such



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donation to a charitable organization it must first document the proposal for the charitable donation and:

- Check that the charity is registered under English law and record evidence of this.
- Be clear as to the purpose of the donation;
- Declare any connection between the proposed charity and any client, contractor, supplier or other relevant third party of;
- Get written approval from a director
- Ensure that all monies are donated directly to the organisation, and not to a particular individual or individuals.

Where there is a connection to a client, contractor, supplier or other third party, which might influence our business or business decisions, or might lead to, or be perceived as leading to improper performance, the director will take the decision to defer such donation until such time as it will not have such an effect.

Facilitation Payments

Facilitation payments are usually defined as small bribes paid to facilitate routine Government action. Although this is not a practice usual within the company's industry sector, employees should be aware that in certain countries, such payments to government officials are customary business practice in order to facilitate a routine action or process.

Facilitation payments are illegal within the UK. As People Connectors Limited only operates within the UK it will never make facilitation payments and no employee or associate of the company may make facilitation payments on its behalf anywhere in the world.

Whistle Blowing Policy

An employee may speak to their line manager/team manager; or if for any reason the employee does not feel able to raise their concerns with their line manager/team manager they should speak directly to a director/compliance officer. Where we receive a complaint involving suspected bribery, we will act quickly to investigate this.

Review and Compliance

We will review this policy on a regular basis to ensure its relevance and effectiveness. If an employee is found to have acted improperly or behaved in a manner which is in contravention of this policy, s/he will be subject to the company's disciplinary policy, and such behaviour could lead to disciplinary action.