

ANTI-BRIBERY POLICY

INTRODUCTION

Bribery is a criminal offence. The Company prohibits any form of bribery. We require compliance with the highest ethical standards and anti-bribery laws applicable from everyone connected with our business. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Encore Personnel Service's employees or by third parties acting for or on behalf of Encore Personnel Services.

PURPOSE AND SCOPE

This policy sets out the steps all of us must take to prevent bribery and corruption in our business, to ensure compliance with anti-bribery laws, rules and regulations, and to ensure we all understand the risks associated with bribery and reporting of any wrongdoing. Risks of involvement in bribery or corruption include unlimited fines if the Company is found guilty of bribery or fails to have adequate procedures in place to prevent bribery, and severe reputational damage to the Company as well as potential withdrawal of contracts. Any person found guilty of bribery will be subject to fines and/or imprisonment of up to 10 years. It is also a requirement of the REC Code of Professional Practice that we act with integrity at all times.

This policy applies to employees of Encore, temporary workers, or any third party providing services to or on behalf of the Company. It is expected that all workers and third parties providing services comply with this policy at all times.

BRIBERY ACT 2010

Under the Bribery Act 2010 it is prohibited, directly or indirectly, for any employee or person working for or on our behalf to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

GIFTS AND HOSPITALITY

We realise that the giving and receiving of gifts and hospitality as a reflection of a good business relationship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry. This does not constitute bribery where it is proportionate and recorded properly. Small gifts (e.g. desk items such as branded mugs and calendars) for example are considered inconsequential and can be given to clients without prior authorisation.

It is not acceptable to give, promise to give, or offer, a payment, charitable donation, gift, or hospitality with the expectation or hope that a business advantage will be received. It is also not acceptable 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.

No gift, payment, or hospitality (with the exception of small inconsequential gifts as detailed above) should be given or offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from the relevant Manager. Similarly, no gift, payment or offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from the relevant Manager.

Approval must be obtained for any requests to entertain clients (e.g. lunch appointments) as per the procedure below:

1. The individual making the request must complete a **Client Entertainment Proposal Request (found on the Company Intranet – Company Documents > Standard Forms and Documents > Operational Forms)** and send to their Divisional/Branch Manager for authorisation. The Client Entertainment Proposal Request Form can be found on the Company Intranet.
2. The Divisional/Branch Manager (or Senior Management Team (SMT) member if no Divisional Manager is available) can approve client entertaining up to a maximum value of **£50**.
3. For client entertainment over the value of £50, a member of the SMT will also need to approve the request.

Any gifts or hospitality given or received over the value of £50 (or approx. £50 per head for hospitality) must be recorded on the Company Gifts and Hospitality Register which can be found at the following location: <J:\Shared Files\Shared Files - Full Access\Anti-Bribery Documents\Gifts and Hospitality Register.xlsx>.

REPORTING PROCEDURE AND RESPONSIBILITIES

The Company is committed to taking appropriate action against bribery and corruption. This may include reporting the matter to an appropriate external body, regulatory agency or the police and/or taking disciplinary action against relevant employees which may lead to dismissal.

If you, as an employee or person working on our behalf, suspect that an act of bribery or attempted bribery has taken place, even if you are not personally involved, you are expected to report this to the HR department as quickly as possible to allow appropriate action to be taken promptly. The Company will keep your disclosure confidential during any investigation, where practical and appropriate in the circumstances. The Company is also committed to ensuring that nobody suffers any detrimental treatment as a result of reporting in good faith suspected or known acts of bribery or corruption.

Staff are also reminded of the Company's Whistleblowing policy which is available in the Employee Handbook.

TRAINING

The Company will provide training to all new starters as part of their induction programme. To ensure that all of us understand our duties and responsibilities under this policy, all employees will be required to read this policy and sign to confirm receipt of, and that you understand and accept the contents of the Anti-Bribery Policy. Managers will be responsible for ensuring that all current employees are aware of and understand this policy.

BREACH OF THIS POLICY

If the Company suspects that you have committed an act of bribery, attempted bribery, or breached any of the provisions of this policy, an investigation will be carried out and, in line with our Disciplinary Procedure, where appropriate, action may be taken against you which may result in your dismissal. For clients or third parties providing services to Encore, breach of this policy this may result in the cessation of our business arrangement with you.

RECORD KEEPING

All employees will be asked to sign a declaration confirming that they have read, understood, and will comply with the Anti-Bribery Policy, declaration forms will be retained in employees personnel files.

As the law is constantly changing, this policy is subject to review on a regular basis and the Company reserves the right to amend this policy without prior notice.