



JGA Recruitment Group Ltd Anti-Bribery Policy

Introduction

JGA Recruitment Group Ltd values its reputation for ethical behaviour, financial probity and reliability. The Company recognises that, in addition to the commission of any criminal offence, involvement in bribery would adversely affect its reputation and the trust placed in it by clients, candidates, employees, contractors, suppliers and other stakeholders.

The Company aims to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Training employees so that they can recognise and avoid bribery by themselves and others;
- Encouraging employees to remain vigilant and report any suspicion of bribery through suitable channels, with sensitive information treated appropriately;
- Rigorously investigating alleged bribery and assisting the police and other appropriate authorities in any resulting investigation or prosecution; and
- Taking firm and appropriate action against any individual involved in bribery.

The Policy

JGA Recruitment Group Ltd prohibits the offering, giving, soliciting or acceptance of any bribe, whether in cash or through any other inducement, to or from any person, company, public official, public body or private organisation, wherever situated.

This prohibition applies to every employee, agent and other person or body acting on behalf of JGA Recruitment Group Ltd. No person may offer, give, request or accept an inducement in order to obtain an improper commercial, contractual, regulatory or personal advantage for the Company, themselves or anyone connected with them.

Further Clarification

JGA Recruitment Group Ltd recognises that market practices can vary between territories and that what may be regarded as customary in one place may not be acceptable in another. This does not override the Company's prohibition on bribery.

The policy prohibits any inducement intended to influence a person improperly or to secure a personal gain or advantage for the recipient, or for a person or body associated with them, where the action sought may not be solely in the interests of JGA Recruitment Group Ltd or of the organisation or person they represent.



The following practices are not intended to be prohibited where they are lawful, reasonable, proportionate, customary for a legitimate business purpose and properly recorded:

- Normal and appropriate business hospitality;
- The giving of a modest ceremonial gift at a festival or other special occasion;
- The use of a recognised fast-track process that is officially available to all on payment of a published fee; and
- The provision of legitimate resources intended solely to help a person or body make a decision more efficiently.

Gifts, Hospitality and Facilitation Payments

Gifts and hospitality must never be offered or accepted where they could reasonably be perceived as intended to influence a business decision improperly. Any gifts or hospitality must be reasonable, proportionate, transparent and appropriately recorded in accordance with Company procedures.

The Company does not permit facilitation payments or unofficial payments made to secure or speed up the performance of a routine action. An official, published fee for a legitimate fast-track service is not a facilitation payment.

If anyone is uncertain whether a proposed gift, hospitality, payment or other action could constitute bribery, they must refer the matter to the Director responsible for this policy before proceeding.

Employee and Associated Person Responsibilities

The prevention, detection and reporting of bribery is the responsibility of all employees and of anyone acting for or on behalf of the Company. Everyone covered by this policy must avoid any activity that could lead to, or suggest, a breach of this policy.

Employees and others acting on behalf of the Company must report any actual or suspected bribery promptly. Concerns may be raised confidentially and will be handled sensitively. No person should suffer retaliation for raising a genuine concern in good faith.

Any breach of this policy by an employee may result in disciplinary action, up to and including dismissal, in accordance with the Company's disciplinary procedures. The Company may terminate its relationship with contractors, agents, suppliers or other associated persons who breach this policy.

Reporting and Investigation

Suspected bribery or corruption should be reported promptly to the Director responsible for this policy or through the Company's applicable whistleblowing or reporting arrangements.



All reports will be considered seriously and, where appropriate, investigated. The Company will preserve relevant records and cooperate with law-enforcement or regulatory authorities where required.

Where a concern involves the person normally responsible for receiving reports, it should be escalated to another appropriate Director or senior decision-maker who is not involved in the matter.

Records and Review

Accurate books, records and supporting documentation must be maintained for payments, gifts, hospitality and other relevant transactions. False, misleading or incomplete records are prohibited.

This policy should be communicated to relevant employees and associated persons and reviewed periodically, and whenever there is a material change in the Company's activities, risk profile or applicable requirements.

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