



## 1. STATEMENT

Interaction Recruitment is committed to the highest standards of ethical conduct and integrity in its business activities in the UK.

This policy outlines Interaction Recruitment's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. Interaction Recruitment will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

Interaction Recruitment may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by Interaction Recruitment.

## 2. SCOPE

This policy applies to all employees and officers of Interaction Recruitment, and to temporary workers, consultants, contractors, agents, and subsidiaries acting for, or on behalf of, Interaction Recruitment ("associated persons") within the UK and overseas. Every employee and associated person acting for, or on behalf of, Interaction Recruitment is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual, and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of Interaction Recruitment.

All agents, sub-contractors and suppliers must write to confirm receipt of the Policy and adherence to it and agree to confirm on an annual basis that this Policy has in fact been followed in their dealings with Interaction Recruitment and on Interaction Recruitment's behalf each year.

## 3. PRINCIPLES

Interaction Recruitment expects its entire staff to operate with integrity and to high standards of ethical conduct when carrying out their duties on behalf of Interaction Recruitment.

### ***They are expected to: -***

- Behave honestly and fairly.
- Comply with all legal and regulatory requirements.
- Conduct themselves in a manner that will enhance the reputation of Interaction Recruitment.
- Treat others with respect.
- Safeguard the assets and property of Interaction Recruitment.

### ***Staff must not: -***

- Use their authority or office for personal gain.
- Recruit or promote employees other than on their ability.
- Take unfair advantage of others through dishonest, unethical, or illegal practices.
- Mis-appropriate the assets or property of Interaction Recruitment.
- Vary from this Ethics Policy or any Interaction Recruitment policy simply based on "commercial necessity".

#### **4. BRIBERY ACT 2010**

Interaction Recruitment is committed to complying with the Bribery Act 2010 in its business activities in the UK.

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the intention of inducing or rewarding improper performance of a function or activity; or knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed during a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if: an employee or associated person acting for, or on behalf of, Interaction Recruitment offers, promises, gives, requests, receives or agrees to receive bribes; or an employee or associated person acting for, or on behalf of, Interaction Recruitment offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence); and Interaction Recruitment does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

4.1. What is prohibited under the Bribery Act 2010 Interaction Recruitment prohibits employees or associated persons from offering, promising, giving, soliciting, or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas.

The bribe might be made to ensure that a person or company improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for Interaction Recruitment in either obtaining or maintaining Company business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

#### **4.2 Record Keeping**

Employees and, where applicable, associated persons, are required to take care to ensure that all company records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers, and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative [in accordance with Interaction Recruitment's procurement and risk management procedures]. Employees and

associated persons are required to keep accurate, detailed, and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

## **5. CORPORATE ENTERTAINMENT, GIFTS, HOSPITALITY, PROMOTIONAL EXPENDITURE**

Interaction Recruitment permits corporate entertainment, gifts, hospitality and promotional expenditure that are undertaken: for establishing or maintaining good business relationships; to improve the image and reputation of Interaction Recruitment; or to present Interaction Recruitment's services effectively; if it is: arranged in good faith, and not offered, promised or accepted to secure an advantage for Interaction Recruitment or any of its employees or associated persons or to influence the impartiality of the recipient.

Interaction Recruitment will authorise only reasonable, appropriate, and proportionate entertainment and promotional expenditure. This principle applies to employees and associated persons, whether based in the UK or overseas.

### **5.1 Charitable Donations**

Interaction Recruitment considers that charitable giving can form part of its wider commitment and responsibility to the community. Interaction Recruitment supports several charities that are selected in accordance with objective criteria, following a risk assessment. Interaction Recruitment may also support fundraising events involving employees.

## **6. FINANCIAL COMPLIANCE AND FINANCIAL RECORDS**

Interaction Recruitment's financial records should be complete and accurate so that they reflect the true state of the business and disclose the true nature of disbursements and transactions. All Interaction Recruitment's books, records, accounts, and financial statements must be maintained in reasonable detail using standard Interaction Recruitment systems; must appropriately reflect Interaction Recruitment's transactions; must conform both to applicable legal requirements and generally accepted accounting principles and to existing systems of internal control. It is prohibited to undertake transactions that contravene tax laws, legal regulations and/or policy or procedural requirements of Interaction Recruitment including:

Making or approving any payment with the understanding that any part of such payment is to be used for any purpose other than that recorded in Interaction Recruitment's books of account and by the documents supporting the payment.

Establish undisclosed funds or assets or to make false or mis-leading entries in any books of accounts or accounting documents or to destroy accounting records and supporting documents within required statutory retention periods.

Use Interaction Recruitment fund or assets for any unlawful purpose. Knowingly make false or inaccurate statements in Interaction Recruitment's control risk self-assessment return and annual certificates made to Interaction Recruitment Finance Department.

Knowingly make any false or inaccurate statements to any of the Auditors carrying out periodic reviews of Interaction Recruitment's accounting records and internal controls.

## **7. CONFIDENTIALITY**

Directors and senior managers must maintain the privacy of non-public confidential information entrusted to them by Interaction Recruitment, its customers, or any other party with whom Interaction Recruitment conducts business. Specific categories of confidential information that should never be disclosed to persons outside Interaction Recruitment, except where disclosure is authorised or legally required would include: -

Business operating information, business and marketing plans, volume data, pricing policies, contract terms, production technologies, customer, and supplier data as well as personal data under the Data Protection Act.

Unpublished financial results, sales details, budgets, bonus able targets and business initiatives under consideration falling within the normal definition of inside information.

Confidential information should not be improperly collected, stored, or distributed, lost, or destroyed.

## **8. CONFLICTS OF INTEREST**

Every employee owes a duty of care to Interaction Recruitment to avoid situations which may give rise to a conflict of interest. A conflict of interest occurs when the private interests or actions of an individual may interfere with the interests of Interaction Recruitment and make it difficult for an individual to perform his or her work objectively and effectively.

Conflicts of interest may also arise where an employee or a member of his or her family received improper benefits or personal advantage due to his or her position in Interaction Recruitment. All such potential conflicts of interest must be notified to the individual's immediate line manager or to the appropriate Interaction Recruitment Board Compliance.

All employees must disclose any direct or indirect interest including shareholdings and family relationships in any competitor company, contractor, supplier, consultancy or any other person or body working with or providing goods or services to Interaction Recruitment. It is particularly important that any employee engaged in purchasing activities or responsible for placing orders for work and services makes an annual declaration to their functional or divisional director of any material.

Interests that they, their spouses or dependents have in suppliers, contractors, consultants or other third parties engaged by Interaction Recruitment. They should also disclose all corporate hospitality and/or gifts they received during their duties.

## **9. RESPONSIBILITIES**

### **9.1 Management Responsibility**

Each manager is accountable and responsible for ensuring compliance with Interaction Recruitment financial and Bribery and Ethics Policy, and where applicable, ensuring that adequate records are maintained to demonstrate compliance. Support is provided at Interaction Recruitment Board level through:

The use of external auditors who audit Interaction Recruitment financial statements to ensure that they give a true and fair view of performance and to comment fully on financial control weaknesses identified in management letters.

Interaction Recruitment Internal Audit team who will undertake a programme of internal reviews and comment on the standard of internal control and compliance with Interaction Recruitment policies and procedures within any given area of Interaction Recruitment.

Interaction Recruitment Internal Auditor formally reports the action taken over any significant control problems identified by external and/or internal audits, the Whistle blowing Policy and/or any other source.

### **9.2 Employees Responsibility**

Employees are required to assist in upholding and maintaining the principles of best practice highlighted in this policy. Employees are required to support the policy in practice through conducting themselves in a truthful, lawful, and ethical manner in all their working practices.

## **10. SUSPECTED BREACHES OF THIS POLICY.**

An 'open door' policy is encouraged throughout Interaction Recruitment so that, if necessary, any queries and concerns can be brought to the attention of management. Interaction Recruitment depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings.

Employees and associated persons are requested to assist Interaction Recruitment and to remain vigilant in preventing, detecting and reporting bribery. Employees and associated persons are encouraged to report any concerns that they may must the Head of Compliance as soon as possible. Issues that should be reported include:

- any suspected or actual attempts at bribery;
- concerns that other employees or associated persons may be being bribed;
- concerns that other employees or associated persons may be bribing third parties, such as clients or officials: or
- any suspected theft or misappropriation of company property.

If reporting through the channel above is considered inappropriate then Interaction Recruitment Commercial & HR Director should be contacted. Employees or associated persons who report instances of suspected bribery or misconduct in good faith will be supported by Interaction Recruitment.

Interaction Recruitment will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to the Head of Compliance.

Interaction Recruitment will fully investigate any instances of alleged or suspected breaches. Employees suspected of bribery or misconduct may be suspended from their duties while the investigation is being carried out. Interaction Recruitment will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal.

Interaction Recruitment may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, Interaction Recruitment who are found to have breached this policy. Interaction Recruitment may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. Interaction Recruitment will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Interaction Recruitment's Whistle blowing Policy provides access to an independent confidential helpline / email and is managed by Interaction Recruitment Compliance and all referrals should be forwarded to [compliance.queries@irweb.co.uk](mailto:compliance.queries@irweb.co.uk) All employees and associated persons are expected to cooperate fully in any internal investigation into illegal or unethical behaviour.

Signed:



Printed name:

**Ben Ambler**

Role:

**Company Director**

Date:

**9<sup>th</sup> November 2023**

Company:

**Interaction Recruitment PLC**

**Company Registration number: 2408326**

**VAT number: 636805426 / UTR number: 1132010069**

**Registered Address: Interaction House, 43 High St, Huntingdon, PE29 3AQ**



