



# APOLLO RECRUIT

## **Anti-Bribery and Corruption Policy** **Apollo Recruitment Solutions Ltd**

### **1. Introduction**

Apollo Recruitment Solutions Ltd ("the Company") is committed to conducting business in an ethical, lawful, and transparent manner. The Company has a zero-tolerance approach to bribery and corruption in all its forms and is committed to ensuring that its employees, business partners, and third parties act with integrity. This policy sets out the Company's stance on preventing bribery and corruption and applies to all employees, contractors, and associated persons.

### **2. Purpose**

The purpose of this policy is to:

- Ensure compliance with the UK Bribery Act 2010 and other relevant anti-corruption laws.
- Establish clear guidelines on what constitutes bribery and corruption.
- Prevent the offering, giving, solicitation, or acceptance of bribes in any form.
- Protect the reputation and integrity of Apollo Recruitment Solutions Ltd.

### **3. Scope**

This policy applies to all individuals working for or on behalf of Apollo Recruitment Solutions Ltd, including:

- Employees (full-time, part-time, temporary, and fixed-term contracts)

- Directors and officers
- Contractors, consultants, and agency staff
- Business partners and third-party service providers

#### **4. Definition of Bribery**

Bribery is the offering, giving, receiving, or soliciting of anything of value to influence the actions of an individual in a business or governmental capacity. It includes:

- Cash payments, gifts, or hospitality intended to secure an unfair advantage.
- Offering or receiving kickbacks, facilitation payments, or inappropriate commissions.
- Payments to expedite or influence official processes.
- Any act that may be considered as improper under the UK Bribery Act 2010.

#### **5. Prohibited Conduct**

All employees and associated persons must NOT:

- Offer, promise, or give bribes to any individual, company, or public official.
- Accept bribes, kickbacks, or gifts intended to influence a business decision.
- Engage in facilitation payments, which are unofficial payments made to speed up an administrative process.
- Fail to report any knowledge or suspicion of bribery.
- Ignore or allow third parties to engage in corrupt practices on behalf of the Company.

#### **6. Gifts and Hospitality**

The Company recognises that business gifts and hospitality, when proportionate and transparent, can play a legitimate role in building relationships. However, they must not be excessive, frequent, or intended to influence business decisions. Employees must:

- Ensure that any gifts or hospitality given or received are reasonable, legal, and recorded.
- Seek prior approval for gifts or hospitality exceeding a reasonable threshold (£100).
- Decline any gifts or hospitality that could create an obligation or perception of impropriety.

#### **7. Charitable Donations and Sponsorships**

Apollo Recruitment Solutions Ltd may support charitable donations and sponsorships, but these must:

- Be approved by senior management.

- Be for legitimate charitable purposes and not a means to influence business decisions.
- Be recorded and transparent.

## **8. Responsibilities**

- **Senior Management:** Ensure compliance with this policy and promote a culture of integrity.
- **Employees:** Read, understand, and adhere to this policy. Report any suspected bribery or corruption.
- **Third Parties:** Agree to comply with this policy when conducting business with Apollo Recruitment Solutions Ltd.

## **9. Reporting Bribery and Corruption**

Employees and third parties must report any suspected bribery or corruption immediately to their line manager, HR, or via the Company's confidential reporting channel. Retaliation against whistleblowers is strictly prohibited.

## **10. Consequences of Non-Compliance**

Breaching this policy may result in:

- Disciplinary action, up to and including dismissal.
- Termination of business relationships with third parties.
- Legal consequences, including fines and imprisonment.

## **11. Training and Awareness**

Apollo Recruitment Solutions Ltd will provide regular training on anti-bribery measures to employees and relevant stakeholders. Employees must complete training as required.

## **12. Review and Monitoring**

This policy will be reviewed annually by senior management to ensure it remains effective and compliant with legal requirements. Any necessary updates will be communicated to employees.

## **13. Policy Approval**

This Anti-Bribery Policy is approved by the Directors of Apollo Recruitment Solutions Ltd and is effective from the date of publication.