

**WRUK LTD T/A WORKSHOP RECRUITMENT
ANTI-BRIBERY AND CORRUPTION POLICY**

Effective Date: 08 June 2026

Review Date: Annually

Policy Owner: Directors

1. POLICY STATEMENT

WRUK Ltd ("the Company") is committed to conducting all business honestly, fairly, ethically and in compliance with all applicable laws and regulations.

The Company adopts a zero-tolerance approach to bribery and corruption in all forms.

We are committed to acting professionally, fairly and with integrity in all business dealings and relationships and to implementing and enforcing effective systems to prevent bribery and corruption.

Any form of bribery, corruption, fraud or improper influence is strictly prohibited.

2. PURPOSE

The purpose of this policy is to:

- Ensure compliance with the Bribery Act 2010.
- Promote ethical business practices.
- Protect the Company's reputation.
- Provide guidance on recognising and avoiding bribery and corruption.
- Establish reporting procedures for concerns and suspected breaches.
- Protect individuals who raise concerns in good faith.

3. SCOPE

This policy applies to:

- Employees.
- Directors.
- Temporary workers.
- Contractors.
- Consultants.
- Agency workers.
- Suppliers.
- Business partners.
- Any individual or organisation acting on behalf of the Company.

The policy applies to all business activities undertaken by or on behalf of the Company both within and outside the United Kingdom.

4. WHAT IS BRIBERY?

A bribe is any financial or other advantage offered, promised, given, requested or accepted with the intention of influencing behaviour or obtaining an improper business or personal advantage.

Bribes may include:

- Cash payments.
- Gifts.
- Hospitality.
- Loans.



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- Discounts.
 - Favours.
 - Employment opportunities.
 - Commission arrangements.
 - Travel or accommodation benefits.
- Bribery can occur in both the public and private sectors.

5. WHAT IS CORRUPTION?

Corruption is the abuse of entrusted power or position for private gain.

Corruption may involve:

- Bribery.
- Fraud.
- Conflicts of interest.
- Abuse of authority.
- Improper influence over business decisions.

6. OUR COMMITMENT

The Company will:

- Never offer, pay, request or accept bribes.
- Maintain accurate financial records.
- Conduct business transparently.
- Assess bribery and corruption risks.
- Provide appropriate training.
- Investigate concerns promptly.
- Support individuals who raise genuine concerns.
- Take appropriate disciplinary action where necessary.

7. EMPLOYEE RESPONSIBILITIES

All individuals covered by this policy must:

- Act honestly and ethically.
- Comply with this policy.
- Remain alert to bribery and corruption risks.
- Avoid situations that may create an actual or perceived conflict of interest.
- Report concerns immediately.
- Cooperate fully with investigations.

Ignorance of this policy will not be accepted as a defence.

8. GIFTS AND HOSPITALITY

The Company recognises that reasonable and proportionate gifts and hospitality can form part of normal business relationships.

However, gifts or hospitality must never:

- Influence business decisions.
- Create a sense of obligation.
- Be offered in return for favourable treatment.
- Create an appearance of impropriety.



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- Be excessive or extravagant.
- All gifts and hospitality must:
- Be reasonable and proportionate.
 - Be transparent.
 - Comply with applicable laws.
 - Be capable of public disclosure without embarrassment.
 - Be approved where required.

The following are strictly prohibited:

- Cash gifts.
- Cash equivalents.
- Gift cards or vouchers.
- Personal payments.
- Secret gifts.
- Gifts linked to contract awards or recruitment decisions.

9. GIFTS AND HOSPITALITY REGISTER

All gifts or hospitality given or received with a value exceeding £50 must be declared to a Director and recorded in the Company's Gifts and Hospitality Register.

Director approval must be obtained before offering or accepting any gift or hospitality valued above £100.

The Company reserves the right to require any gift to be declined or returned.

10. RECRUITMENT-SPECIFIC RISKS

As a recruitment business, particular care must be taken regarding:

- Candidate introductions.
- Temporary worker placements.
- Supplier relationships.
- Client entertainment.
- Procurement decisions.
- Referral arrangements.

No employee may:

- Accept payment from candidates seeking work.
- Accept personal commissions from suppliers.
- Offer inducements to secure placements.
- Accept rewards for favouring specific candidates, clients or suppliers.

11. FACILITATION PAYMENTS

Facilitation payments are unofficial payments made to secure or accelerate routine actions.

The Company prohibits facilitation payments regardless of local custom or practice.

Any request for such a payment must be reported immediately to a Director.

12. POLITICAL DONATIONS

The Company does not make donations to political parties, political organisations or political candidates.

No individual may make a political donation on behalf of the Company without Board approval.

13. CHARITABLE DONATIONS



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The Company may support charitable causes where appropriate.

All charitable donations made on behalf of the Company must:

- Be approved by a Director.
- Be transparent.
- Be accurately recorded.
- Not be used to obtain business advantages.

14. CONFLICTS OF INTEREST

Employees must avoid situations where personal interests conflict, or may appear to conflict, with Company interests.

Examples include:

- Personal relationships with suppliers.
- Financial interests in client organisations.
- Family connections affecting recruitment decisions.

Any actual or potential conflict must be disclosed to a Director immediately.

15. THIRD-PARTY DUE DILIGENCE

The Company may undertake appropriate due diligence on:

- Suppliers.
- Contractors.
- Consultants.
- Business partners.
- Referral partners.

Where concerns arise, additional checks may be required before a business relationship proceeds.

16. IDENTIFYING RED FLAGS

Potential indicators of bribery may include:

- Unusual payment requests.
 - Requests for cash payments.
 - Lack of documentation.
 - Excessive commissions.
 - Pressure to bypass procedures.
 - Secretive behaviour.
 - Requests for payments to third parties.
 - Unusual hospitality arrangements.
- Any concerns should be reported immediately.

17. REPORTING CONCERNS

Anyone covered by this policy who becomes aware of suspected bribery or corruption must report it immediately.

Reports should be made to:

- A Director; or
- The Company's designated reporting contact.

Reports will be treated seriously and investigated appropriately.

Failure to report known misconduct may itself constitute a disciplinary matter.



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18. WHISTLEBLOWING PROTECTION

The Company encourages employees to raise genuine concerns without fear of retaliation.

No individual will suffer dismissal, disciplinary action, victimisation or disadvantage for reporting concerns in good faith.

Malicious or deliberately false allegations may result in disciplinary action.

19. INVESTIGATIONS

The Company will:

- Investigate allegations promptly.
- Maintain confidentiality where possible.
- Preserve evidence.
- Take appropriate corrective action.
- Report matters to regulatory or law enforcement authorities where necessary.

20. RECORD KEEPING

Accurate books, records and accounts are essential.

All transactions must:

- Be accurately recorded.
- Be supported by appropriate documentation.
- Reflect their true purpose.

The Company prohibits:

- False accounting.
- Off-book accounts.
- Concealed payments.
- Misleading records.

21. MONITORING AND REVIEW

The Directors are responsible for:

- Monitoring compliance.
- Reviewing this policy annually.
- Assessing bribery risks.
- Implementing improvements where required.

Compliance checks may be carried out periodically.

22. BREACH OF THIS POLICY

Any breach of this policy may result in disciplinary action.

Serious breaches may constitute gross misconduct and result in summary dismissal.

The Company may also:

- Terminate business relationships.
- Report matters to regulators.
- Refer matters to law enforcement agencies.
- Pursue recovery of losses where appropriate.

EMPLOYEE DECLARATION



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I confirm that I have read, understood and agree to comply with the Company's Anti-Bribery and Corruption Policy.

Employee Name: _____

Signature: _____

Date: _____



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