MARICE RECRUITMENT AGENCY LTD
EMPOWERING CARE, SUPPORTING OPERATIONS, ENSURING EXCELLENCE.

Anti-Bribery and Corruption Policy

Policy Control Information

Item	Details
Policy Title	Anti-Bribery and Corruption Policy
Policy Reference	MRA-POL-002
Policy Owner	MRA Ltd
Designated Safeguarding Lead	HR Manager
Version	0.2 edited
Approved By	Managing Director
Issue Date	25/11/2026
Review Date	Annually, and after any change in the law, a serious incident or an audit finding

1. Policy Statement

Marice Recruitment Agency Ltd ("the company") does not offer, pay, ask for or accept bribes in any form, and does not allow anyone working for it or on its behalf to do so. Winning or keeping client contracts, placements or supplier deals through bribery is never acceptable, whatever the local custom or the value involved.

This policy is based on:

- Bribery Act 2010, including section 7 (failure of a commercial organisation to prevent bribery)
- Ministry of Justice guidance on adequate procedures
- Companies Act 2006, sections 175 to 177 (directors' duties on conflicts and benefits)

2. Purpose

To clarify what counts as a bribe, set rules for gifts and hospitality, and implement adequate procedures to protect the company, its staff, and its clients.

3. Scope

This policy applies to all directors, managers and internal staff of Marice Recruitment Agency Ltd, wherever they are based, and to every worker the company supplies or introduces to clients in Healthcare Staffing, Warehouse, Logistics and Cleaning Services. It also applies to contractors, suppliers and anyone acting on the company's behalf.

4. What Counts as Bribery

A bribe is anything of value offered, promised, given, asked for or received to make someone act improperly in their role, or as a reward for doing so. It can be money, a gift, hospitality, a job or placement for a relative, a discount, or a favour. In recruitment, examples include:

- A payment or gift to a client's manager to win a staffing contract or more shifts
- A worker paying a recruiter to be placed, moved to better shifts or passed through checks
- A recruiter accepting money to overlook a missing check or a false document
- A supplier offering a personal benefit to a manager in return for a contract

5. Facilitation Payments and Kickbacks

Facilitation payments (small unofficial payments to speed up a routine process) and kickbacks are bribes under UK law and are banned. If anyone asks for one, refuse, write down what happened and tell the DOQA Department Head the same day.

6. Gifts and Hospitality

- Modest gifts and normal business hospitality are allowed only if they are reasonable, open, not given in cash, and not linked to any decision such as a tender, contract renewal or placement
- Cash, vouchers that can be exchanged for cash, and gifts from workers to the recruiters who place them are never accepted
- Every gift or hospitality offered or received, accepted or declined, is recorded in the Gifts and Hospitality Register
- Anything that could look like it influences a decision is referred to the Managing Director before it is accepted or given

7. Donations and Sponsorship

The company does not make political donations. Charitable donations and sponsorship need the Managing Director's written approval and are recorded.

8. Due Diligence on Third Parties

Before the company works with a supplier, business development partner or anyone who acts for it, it checks who they are, why they are needed and how they are paid. Contracts include anti-bribery terms, and payments go only to the business bank account named in the contract.

9. Reporting Concerns

Anyone who is offered a bribe, or suspects bribery, must tell the DOQA Department Head or the Managing Director straight away. Concerns can also be raised under the Whistleblowing Policy (MRA-POL-007). Nobody will suffer for refusing to pay or accept a bribe, even if the company loses business as a result.

10. Consequences of a Breach

A breach of this policy by staff will be dealt with under the Employee Conduct and Disciplinary Policy (MRA-POL-012) and may be gross misconduct. Contracts with suppliers or partners who breach it may be ended. Bribery is a criminal offence and may be reported to the Police or the Serious Fraud Office.

11. Governance and Review

The Managing Director has overall accountability. The DOQA Department Head maintains the Gifts and Hospitality Register, provides anti-bribery training at induction and annually, and reviews this policy annually, or sooner if the law or the company's business changes.