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1. DEFINITIONS

In this policy, “we”, “us” and “the Company” mean Quest Employment.

“Bribe” means an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. “To bribe” and “bribery” shall be interpreted accordingly.

“Relevant Person” means any individual, whether an officer or employee of the Company, or an Agency Worker, worker, contractor or consultant providing services to or on behalf of the Company, and any corporate entity performing functions for or on behalf of the Company.

“Associated Person” means any person or entity performing services for or on behalf of Quest Employment, where relevant under the Bribery Act 2010.

2. INTRODUCTION

One of the Company’s core values is to uphold responsible and fair business practice. The Company is committed to promoting and maintaining the highest level of ethical standards in all of its business activities. Its reputation for maintaining lawful business practices is of paramount importance, and this policy is designed to preserve those values.

Anti-Bribery and Corruption Policy

Quest Employment has a zero-tolerance approach to bribery and corruption and is committed to acting fairly, lawfully and with integrity in all business dealings and relationships, and to implementing and enforcing effective systems to prevent bribery.

3. PURPOSE AND SCOPE OF THIS POLICY

This policy sets out the steps that must be taken to prevent bribery and corruption in connection with Quest's business and to comply with relevant legislation. It is aimed at:

- ensuring compliance with anti-bribery laws, rules and regulations in the UK and in any other country in which the Company carries out business or with which its business is connected
- enabling Relevant Persons to understand the risks associated with bribery and to recognise, prevent and report wrongdoing, whether by themselves or others
- providing suitable and secure reporting and communication channels and ensuring that reports are dealt with properly and effectively
- creating and maintaining a rigorous and effective framework for dealing with suspected bribery or corruption

All Relevant Persons and Associated Persons are expected to adhere to the principles set out in this policy.

4. THE BRIBERY ACT 2010

The Bribery Act 2010 came into force on 1 July 2011 and applies to the Company's business activities wherever they are carried out.

Under the Bribery Act it is an offence to:

1. bribe another person, namely to offer, promise or give a financial or other advantage with the intention of inducing or rewarding improper conduct
2. receive a bribe, namely to request, agree to receive or accept a financial or other advantage for or in relation to improper conduct
3. bribe a foreign public official
4. fail to prevent bribery

5. RISKS OF NOT ACTING WITH INTEGRITY

Involvement in bribery or corruption carries significant risks, including:

- exposure to blackmail and loss of control over business relationships
- unlimited fines for the Company if it is found guilty of bribery or of failing to prevent bribery
- fines and/or imprisonment of up to 10 years for individuals found guilty
- severe reputational damage
- loss or weakening of banking, insurance or supply arrangements
- exclusion from tender opportunities
- difficulty attracting and retaining good people

6. BENEFITS OF ACTING WITH INTEGRITY

Acting with integrity brings clear benefits, including:

- improving the Company's chances of being selected as a supplier in both public and private sectors
- maintaining good standing with banks, clients, customers and suppliers
- supporting a positive and ethical place to work
- complying with the REC Code of Professional Practice and other expected business standards

7. POLICY STATEMENT

All Relevant Persons and Associated Persons are required at all times:

- not to commit any offence referred to in section 4 or any other bribery or corruption offence
- to comply with the Bribery Act 2010
- to act honestly, responsibly and with integrity
- to uphold the Company's core values by operating in an ethical, professional and lawful manner at all times

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside, or account created for the purpose of facilitating the payment or receipt of a bribe.

If you are in doubt as to what may amount to bribery or what may constitute a breach of this policy, you must refer the matter to the appropriate Compliance contact or designated senior manager.

8. GIFTS AND HOSPITALITY

The Company may occasionally provide gifts and hospitality to clients, customers, contractors and suppliers. This is not prohibited by the Bribery Act, provided that:

- the gift or hospitality is not intended to influence a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage
- it complies with local law
- it is given in the Company's name, not in a personal name
- it does not include cash or a cash equivalent, such as gift vouchers
- it is of an appropriate and reasonable type and value and is given at an appropriate time
- it is given openly, not secretly
- it is approved in advance by a Company director where required

It is not acceptable to give, promise, offer, request or accept a payment, gift or hospitality where you know or suspect it is intended to secure an improper business advantage.

9. FACILITATION PAYMENTS

Any payment or gift to a public official or other person to secure or accelerate the performance of a routine government procedure or process, commonly known as a facilitation payment, is strictly prohibited.

10. INDICATORS OF BRIBERY

Common indicators of bribery or corruption may include:

- payments for unusual amounts, such as excessive commission, or payments made in unusual ways
- what would normally be a single payment being split into stages
- use of unfamiliar bank accounts, currencies or countries with no obvious connection to the transaction
- bypassing normal approval or sign-off processes
- secrecy around commercial relationships or activities
- unexplained travel or lifestyle changes
- decisions for which there is no clear rationale
- incomplete or missing records

11. POLITICAL DONATIONS

Quest Employment does not make donations to political parties. No individual may make a political donation on behalf of the Company without prior Board approval.

12. CHARITABLE DONATIONS

Charitable donations may, in some circumstances, be used improperly to disguise bribery. Any charitable donation made by or on behalf of the Company must be properly approved and recorded. Individuals must not make charitable donations on behalf of the Company without prior approval.

13. LOCAL CIRCUMSTANCES

The Company recognises that customs and practices vary between countries and cultures. However, this does not change our position: we do not pay or accept bribes or act corruptly. Where local custom raises uncertainty, the matter must be referred for appropriate guidance before action is taken.

14. EXCEPTIONAL CIRCUMSTANCES

In rare circumstances, a payment may be made where a person faces an immediate threat to their personal safety or that of another individual. In such cases, the matter must be reported as soon as possible, fully documented, and escalated to the appropriate senior contact within 1 working day.

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15. RESPONSIBILITY TO REPORT AND THE REPORTING PROCESS

All Relevant Persons are required to take reasonable steps to ensure compliance with this policy and to prevent, detect and report suspected bribery or corruption.

If you know or suspect that any Relevant Person plans to offer, promise or give a bribe, or to request, agree to receive or accept a bribe in connection with the Company's business, you must report the matter promptly through the appropriate internal reporting route, including your manager, the Compliance Team, or another designated senior contact.

The Company is committed to taking appropriate action in response to bribery and corruption concerns. This may include reporting the matter to the police, a regulator or another appropriate authority and/or taking internal action against those involved.

The Company will treat disclosures as confidential so far as reasonably practicable and will support anyone who raises genuine concerns in good faith. No one should suffer detrimental treatment for refusing to take part in bribery or corruption, or for reporting concerns in good faith.

16. RECORD KEEPING

All accounts, receipts, invoices and other records relating to dealings with third parties must be prepared and maintained accurately and completely. No off-the-record accounts may be kept for the purpose of facilitating or concealing improper payments.

17. MONITORING COMPLIANCE

The Compliance Team has primary responsibility for ensuring compliance with this policy and will review it regularly. The Compliance Team will monitor its effectiveness and provide reports where appropriate to the directors responsible for oversight.

18. TRAINING

The Company will provide appropriate anti-bribery training to employees and, where relevant, to other Relevant Persons. The Company's zero-tolerance approach to bribery and corruption will also be communicated to business partners at the outset of the relationship and as appropriate thereafter.

19. SANCTIONS FOR BREACH OF THIS POLICY

A breach of this policy by a Relevant Person who is an officer or employee of the Company may constitute a disciplinary offence and may, depending on the seriousness of the matter, amount to gross misconduct.

A breach of this policy by an Agency Worker, worker, contractor or consultant may result in removal from Assignment, termination of engagement, termination of contract, or other appropriate action.

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A breach of this policy by a corporate entity may result in suspension or termination of any relevant contract, sub-contract or other agreement with the Company.

This document is effective from:

23rd March 2026

This document is approved by:

Jim Bluck, Chief Commercial Officer



For questions or queries about this document, contact:

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