Anti-Bribery and Corruption

Policy

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Policy Statement

Lilac Alliance is committed to conducting all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate.

As a recruitment business, Lilac Alliance maintains relationships with candidates, workers, clients and suppliers across the health and social care sector. We recognise that these relationships bring a responsibility to ensure that no part of our business, or anyone acting on our behalf, engages in bribery or corruption in any form.

Purpose of This Policy

Bribery is a criminal offence under the Bribery Act 2010 (the "Act"). This policy sets out the responsibilities of Lilac Alliance (the "Company"), and of those who work for us or on our behalf, in observing and upholding our position on bribery and corruption, and provides guidance on how to recognise and deal with bribery and corruption issues.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Who This Policy Applies To

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. All our staff have an obligation to familiarise themselves with this policy and to conduct business in a manner that prevents bribery and corruption.

What is Bribery

Bribery is offering, promising, giving, accepting or requesting an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Bribes can take the form of money, gifts, loans, fees, rewards or other advantages. Under the Act, it is an offence to:

- Bribe another person, including offering, promising or giving a financial or other advantage.
- Request, agree to receive or accept a bribe.
- Bribe, or attempt to bribe, a foreign public official.
- Fail, as a commercial organisation, to prevent bribery being carried out on our behalf by an associated person.

Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality, such as promotional or business-related gifts and reasonable entertainment, given or received for legitimate purposes. We will only ever give or accept gifts or hospitality if it is reasonable, proportionate, and given openly, not secretly. Gifts or hospitality above a modest value must be declared to a Director before being given or accepted.

Facilitation Payments and Kickbacks

Lilac Alliance does not make, and will not accept, facilitation payments of any kind. A facilitation payment is a small, informal payment made to secure or speed up a routine action by a public official. We will not accept kickbacks of any description, which are typically a payment made in return for a business favour or advantage.

Job Finding Fees

Consistent with our commitment to ethical recruitment practice, the Company accepts job finding fees as a business cost and will not allow these to be paid by job applicants, candidates or workers.

Political and Charitable Donations

Lilac Alliance does not make donations to political parties. Any charitable donations made on behalf of the Company must be approved in advance by a Director and must never be used as a means of concealing bribery.

Responsibility For The Policy

Ultimate responsibility for anti-bribery compliance rests with the Company's leadership team. The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

Simon Goddard has primary day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering bribery and corruption.

Employees at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and on the issue of bribery and corruption.

Record Keeping

We keep financial records and have appropriate internal controls in place to evidence the business reason for any payments made to third parties. All expenses claims relating to gifts, hospitality or expenses incurred with third parties must be submitted in accordance with our expenses policy and must specifically identify the reason for the expenditure.

How to Raise a Concern

The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected bribery or corruption associated with the Company, or with our suppliers or clients, may be reported by employees in this manner.

In summary, employees should approach their Divisional Director. The nature of the complaint will determine the Company's next course of action. Members of the public or people not employed by us are encouraged to write, in confidence, to the Directors at Bank House, Marshall Terrace, Crossgates, Leeds, LS15 8EA to raise any concern relating to bribery or corruption.

Protection for Whistleblowers

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that bribery or corruption of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

Training and Communication

Training on this policy, and on the risk our business faces from bribery and corruption, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary. Our zero-tolerance approach to bribery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them, and reinforced as appropriate thereafter.

Review

Following its initial adoption, this Anti-Bribery and Corruption Policy will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time.