# Anti-bribery and anti-corruption policy

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This policy applies to everybody who works for or with HIRINGUK LTD: the director, anybody we employ or engage, and any contractor, agent or supplier acting on our behalf. It is published because a policy nobody can read protects nobody.

## 1. Our position

We do not offer, promise, give, request, agree to receive or accept a bribe. Not to win business, not to keep it, not to speed something up, and not to make a problem go away. That applies whether the other party is a private business, a public official, at home or abroad, and whether the benefit would go to us or to somebody else.

We take the same view of corruption more widely: kickbacks, secret commissions, and payments dressed up as something else are all the same thing with better manners.

## 2. The law we are working to

The Bribery Act 2010 creates four offences: bribing another person, being bribed, bribing a foreign public official, and, for a commercial organisation, failing to prevent bribery by somebody acting on its behalf. That last one matters most to us: a company can be liable for what a contractor or agent does, and its only defence is having adequate procedures in place. This policy, and the checks below, are those procedures.

Penalties are unlimited fines for the company and up to ten years in prison for individuals. Nothing we could win with a bribe is worth that, and nothing we could lose by refusing one is either.

## 3. Facilitation payments and kickbacks

We do not make facilitation payments, the small unofficial payments sometimes asked for to speed up a routine process. They are illegal under the Act even where they are common locally. If anybody asks you for one on our behalf, the answer is no, and you tell the director.

We do not pay or accept kickbacks: a payment or benefit in return for putting business somebody's way. In recruitment that has a specific and ugly form, which is why it is spelled out below.

## 4. What this means in recruitment, specifically

This industry has particular ways of going wrong, so we name them:

- We never charge a work seeker a fee, for finding work, for registering, for training, for equipment, for accommodation or for anything else. That is the law (Conduct of Employment Agencies and Employment Businesses Regulations 2003) and it is also the line we would hold anyway.
- We do not pay anybody to send us candidates in a way that is hidden from those candidates, and we do not accept payment from a candidate to be put forward ahead of somebody else.
- We do not pay a hiring manager, or anyone at a client, to award us work. No cash, no gift, no hospitality dressed up as a thank you.
- We do not take payment to remove or suppress an advert or a report, and we do not take payment to leave a bad advert up. Adverts come down on the rules, not on the invoice.
- Featured placement is bought openly, at a published price, and it is labelled as featured on the page. There is no hidden ranking for sale.

## 5. Gifts and hospitality

Modest, open and infrequent hospitality is normal in business and is not a bribe: a coffee, a sandwich at a meeting, a Christmas card. It becomes a problem when it is intended to influence a decision, when it is disproportionate, when it is given in secret, or when it is offered around the time a decision is being made.

Our working rule: nothing is accepted or given that we would be uncomfortable seeing written down. Anything with a value above roughly £50, and anything offered while a contract or a complaint is live, is refused or declared to the director and recorded. Cash, or anything equivalent to cash, is always refused.

## 6. Suppliers, contractors and anybody acting for us

Anybody engaged to act on our behalf is told about this policy and is expected to work to it. We do not engage a supplier who expects to work any other way, and we will end an arrangement over this without argument. Where we use a payment provider, a hosting provider or any other supplier, they are chosen on price and quality, in writing.

## 7. Records

Our accounts, invoices and expense records are kept accurately and completely, and no payment is recorded misleadingly or left off the books. Every advert sold on this site produces an order reference, an invoice and a payment record, which is a considerable part of why fraud is difficult here.

## 8. Raising a concern

If you suspect bribery or corruption involving this company, tell us: hello@hiringuk.co.uk, marked for the director. Say what you saw, and when. You can do it anonymously, and you can use the report form if you would rather not send an email.

Nobody suffers for raising a concern in good faith, even if it turns out to be a misunderstanding. Retaliation against somebody who reports a genuine concern would itself end a working relationship with us immediately. If you would rather go outside the company, the charity Protect (protect-advice.org.uk) gives free, confidential whistleblowing advice, and serious matters can be reported to the police or to Action Fraud on 0300 123 2040.

## 9. Our procedures, against the six principles

The Ministry of Justice guidance under section 9 of the Bribery Act sets out six principles for adequate procedures. Here is what each one means in a business this size, so the claim can be checked rather than taken on trust.

Principle | What we do

Proportionate procedures | This policy, published rather than filed, plus the rules in the terms of business and the advert rules. Prices are published, so there is no discretion to sell at a special rate to a favoured buyer.

Top level commitment | The director owns this policy, approved it, and is the person a concern is reported to. There is no layer between the two.

Risk assessment | Reviewed annually and recorded. The assessment as it stands is in section 10.

Due diligence | Suppliers are chosen on price and quality, in writing. Anybody acting on our behalf is told about this policy before they start and is expected to work to it.

Communication and training | The policy is on the public website, so a customer, a candidate or a supplier can read it without asking. Anybody who joins or is engaged reads it and signs the training record before they are given access to anything.

Monitoring and review | Reviewed every twelve months and after any significant change, with the date recorded on this page.

## 10. Our risk assessment

An honest assessment for a business of this size and type:

- Low risk overall. We sell advertising at published prices, take payment through regulated providers, operate only in the UK, deal with no public officials in the course of business, and have no agents, introducers or intermediaries selling on our behalf.
- The highest residual risk is the kickback: somebody at a customer being offered a benefit to place their advertising here, or somebody here being offered a benefit to give an advertiser preferential treatment. Section 4 addresses that directly and the published price list removes most of the room for it.

- The second is discounting. A discount given quietly to one buyer and not another is how favouritism starts. Discounts are published, apply to everybody who qualifies, and appear on the invoice.
- Risk will rise if we ever take on sales staff, resellers or introducers, or start bidding for public sector contracts. When that happens this policy gets stronger procedures, not just a new date, and we will say here what changed.

## 11. Training and records

Everybody who works for or with us reads this policy before they start and confirms it in writing. We keep a training record: the name, the date, the version of the policy read, and any refresher. Refresher training is at least annual. Today the business is run by its director alone, so the record has one line in it, and that is stated rather than dressed up. Each new person or contractor is added to it before they are given access to any account, and the number trained is reported at the next review.

A blank training and acknowledgement record is on the downloads page, so anybody joining can sign the same form.

## 12. Approval and review

Approved by Grigore Octavian Pupazan, director of HIRINGUK LTD, on 28 August 2026. This policy is reviewed at least once every twelve months, and sooner whenever the business changes in a way that affects it: taking on staff, engaging agents or contractors who sell for us, or starting to work with the public sector. Next review due: August 2027.