



## Fruitful Jobs Ltd Anti-Bribery & Anti-Corruption Policy

### 1. What is this document?

- a. This document sets out the responsibilities of those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.
- b. It also acts as a source of information and guidance for those working for Fruitful Jobs Ltd, helping them recognise and deal with bribery and corruption issues.

### 2. Policy Statement

- a. Fruitful Jobs Ltd is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented.
- b. Fruitful Jobs Ltd has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships, where in the country we operate.

### 3. Who is covered by the policy?

- a. This policy applies to all employees, workers and any other person or persons associated with us (including third parties)
- b. In the context of this policy, third party refers to any individual or organisation our company meets and works with, including actual and potential clients, customers and suppliers.
- c. Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

### 4. Definitions of Bribery

- a. Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.
- b. A bribe refers to any inducement, reward, or object / item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

### 5. What is and what is NOT acceptable

#### a. Gifts & Hospitality

- i. Fruitful Jobs Ltd accepts normal and appropriate gestures of hospitality and goodwill (whether given to / received from third parties), so long as the giving or receiving of the gifts meets the following
  1. It is not made with the intention of influencing the party to whom it be being given, to obtain, or reward the retention of business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
  2. It is not made with the suggestion that a return favour is expected.
  3. It is in compliance with local law.
  4. It is given in the name of the company, not in an individual name.
  5. It does not include cash or a cash equivalent (eg voucher / gift certificate)

6. It is appropriate for the circumstances, it is of an appropriate type and value, taking into account the reason for the gift.
  7. It is given / received openly, not secretly.
  8. It is not selectively given to a key influential person, clearly with the intention of directly influencing them.
- ii. Fruitful Jobs Ltd recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures and religions, so definitions of what is acceptable and not acceptable with inevitably differ for each.
  - iii. As good practise, gifts given and received should also be disclosed.

**b. Facilitation Payments and Kickbacks**

- i. Fruitful Jobs Ltd does not accept and will not make any form of facilitation payments of any nature. We recognise these are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.
- ii. Fruitful Jobs Ltd does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

**c. Political Contributions**

- i. Fruitful Jobs Ltd will not make donations, whether in cash, kind, or by any means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

**d. Charitable Contributions**

- i. Fruitful Jobs Ltd accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions, and agrees to disclose all charitable contributions it makes.
- ii. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

**6. Employee Responsibilities**

- a. You must ensure that you read, understand and comply with the information in this policy, and with any training or any other information you are given.
- b. All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this policy.
- c. If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches the policy, you must notify Rachel Hubbard or Justin Emery.
- d. If any employer or worker breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Fruitful Jobs Ltd has the right to terminate a contractual relationship with an employer or worker if they breach this policy.

**7. What happens if I need to raise a concern?**

**a. How to raise a concern**

- i. If you suspect there is an instance of bribery or corruption, you are encouraged to raise your concerns at as early a stage as possible. If you are unsure whether a certain action of behaviour can be considered bribery or corruption you should speak to Rachel Hubbard.

- ii. Fruitful Jobs Ltd will familiarise all employees / workers with its whistle blowing procedures so employees can vocalise their concerns swiftly and confidentially.

**b. What to do if you are a victim of bribery or corruption**

- i. You must inform Fruitful Jobs Ltd as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future.

**c. Protection**

- i. If you refuse to accept or offer a bribe or you report a concern relating to a potential act of bribery or corruption. Fruitful Jobs Ltd understands that you may feel worried about potential repercussions. Fruitful Jobs Ltd will support anyone who raises concerns in good faith under this policy, even if the investigation finds they were mistaken.
- ii. Fruitful Jobs Ltd will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe. Detrimental treatment refers to dismissal, disciplinary action, threats or unfavourable treatment in relation to the concern the individual raised.

**8. Training and communication**

- a. Fruitful Jobs Ltd will review this policy on a 2 year basis and will monitor training that may be required for workers.
- b. Fruitful Jobs Ltd policy of zero-tolerance will be clearly communicated to all suppliers, contractors, business partners and customers.

**9. Review & Monitoring**

- a. Rachel Hubbard is responsible for monitoring the effectiveness of this policy and will review the implementation of it at least every 2 years.
- b. Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved.

Justin Emery

1/1/2019