



Capital Staffing Services Ltd  
ANTI-BRIBERY AND CORRUPTION POLICY FOR CAPITAL  
STAFFING SERVICES

## Introduction

This ANTI-BRIBERY AND CORRUPTION POLICY relates to actions and activities during the financial year 05 April 2023 to 04 April 2024.

The statement sets down **Capital Staffing Services Ltd** commitment to preventing Bribery and Corruption in our business activities and the steps we have put in place with the aim of ensuring that there is no bribery or corruption in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

## Organisational structure and supply chains

This statement covers the business activities of **Capital Staffing Services Ltd** which are as follows:

CAPITAL STAFFING SERVICES LTD UNDER COMPANY NUMBER 04257718 ON THE FRAMEWORK OF RM6161 AND CQC REGISTERED ACTS AS A RECRUITING AGENCY FOR TEMPORARY RECRUITMENT OF CLINICAL AND HEALTHCARE STAFF FOR ALL JOB ROLES AND BANDS ACROSS THE UK, APPROVED BY NHS ENG.

The Company currently operates in the following countries:

United Kingdom territories.

**Policy Statement:** Capital Staffing Services is committed to conducting its business with integrity and in compliance with all applicable laws and regulations related to anti-bribery and corruption. We prohibit all forms of bribery and corruption, including but not limited to, offering, promising, giving, or accepting bribes in any form, whether directly or indirectly, to or from any person or entity, including public officials, in order to obtain or retain business or gain any improper advantage.

**Compliance with Laws:** Capital Staffing Services will comply with all applicable anti-bribery and corruption laws and regulations, including but not limited to the UK

**Bribery Act 2010**, and other relevant laws in jurisdictions where we operate. We will also comply with any applicable industry standards and guidelines related to anti-bribery and corruption.

**Prohibited Activities:** Capital Staffing Services prohibits all forms of bribery and corruption, including but not limited to, the following activities:

- a. Offering, promising, giving, or accepting bribes, kickbacks, or any other improper payments or favors, whether in cash or in kind, to or from any person or entity, including public officials, to influence business decisions or gain any improper advantage.
- b. Using intermediaries, agents, or third parties to pay bribes or engage in other corrupt activities on our behalf.
- c. Making or receiving facilitation payments, which are small payments made to expedite routine government actions, even if they are considered customary or acceptable in a particular country or industry.
- d. Engaging in any other activity that may constitute bribery, corruption, or any form of unethical or illegal behavior.

**Due Diligence:** Capital Staffing Services will conduct due diligence on our employees, agents, intermediaries, contractors, and other business partners to ensure their compliance with anti-bribery and corruption laws and standards. This may include verifying their business practices, financial transactions, and relationships with public officials or other third parties.

**Gifts and Hospitality:** Capital Staffing Services acknowledges that the provision and receipt of gifts, hospitality, and entertainment may be a common business practice, but it can also be used as a means of bribery or corruption. Therefore, all gifts, hospitality, and entertainment offered or received in connection with our business activities must be reasonable, proportionate, and in compliance with applicable laws and regulations, and should not be offered or received with the intent to influence or obtain any improper advantage.

**Record Keeping:** Capital Staffing Services will maintain accurate and transparent records of all financial transactions, including payments, receipts, and other financial records, related to our business activities, in accordance with applicable laws and regulations. All records must be complete, accurate, and kept for the required retention period.

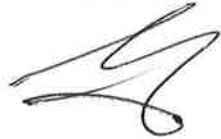
**Reporting and Whistleblowing:** Capital Staffing Services encourages all employees, contractors, and stakeholders to report any concerns or suspicions of bribery or corruption through our established reporting channels. We will investigate all reported cases promptly and take appropriate actions to address any confirmed violations. We will also protect whistleblowers from retaliation in accordance with applicable laws and our internal policies.

**Training and Awareness:** Capital Staffing Services will provide training and awareness programs to our employees, agents, intermediaries, and other relevant parties to raise awareness about anti-bribery and corruption laws, policies, and procedures, and to ensure they understand their responsibilities in preventing and detecting bribery and corruption in our business activities.

**Monitoring and Auditing:** Capital Staffing Services will regularly monitor and audit our financial transactions, business practices, and internal controls to assess compliance with our anti-bribery and corruption policies and procedures. This may include conducting internal audits, site visits, inspections, and third-party audits to verify compliance and

This ANTI-BRIBERY AND CORRUPTION POLICY Statement has been approved and authorised by:

Name: Gerard McHugh  
Position: Chief Executive Officer  
Date: 14/04/2023  
Signature:

A handwritten signature in black ink, appearing to be 'G. McHugh', written over a horizontal line.

