PINEAPPLE PARTNERS

Anti-Bribery Policy

Title of Policy Document **Issue Date and Version**	Anti-Bribery January 2026 (Version 1)
Author / Department	Executive Management Team
Signed off by	 Director
Next review date	January 2027
Distribution	All services
First issue date	January 2026

1. Our position

Pineapple Partners does not offer, give, request or accept bribes, and does not tolerate anyone doing so on its behalf. We compete on the quality of our candidates and our service, nothing else. This policy implements the Bribery Act 2010, under which bribery is a criminal offence for individuals and for the business, wherever in the world it happens.

2. What bribery is

A bribe is a financial or other advantage offered, promised or given to induce someone to perform a function improperly, or to reward them for doing so, and equally, requesting or accepting such an advantage. It does not have to be cash: jobs for relatives, lavish hospitality, gifts with strings attached and “facilitation payments” all count. Facilitation payments, small payments to speed up routine actions, are illegal in the UK and we do not make them.

3. The six principles

Our procedures follow the Ministry of Justice’s six principles for preventing bribery: proportionate procedures for a business of our size and risk; top-level commitment, this policy is owned by the Director and the tone is set from the top; periodic risk assessment of where bribery could touch our business, chiefly the award of supply contracts and preferential treatment of candidates; due diligence on the people and organisations we work with; communication and training so everyone knows the rules; and monitoring and review, at least annually.

4. Gifts and hospitality

Modest, transparent hospitality is a normal part of business and this policy does not ban a working lunch or a branded notepad. The tests are openness, proportion and intent. Gifts or

hospitality beyond token value, as a working guide, anything above roughly £50, or anything repeated, must be declared to the Director before acceptance and recorded in our gifts and hospitality register. Cash or cash-equivalent gifts are never acceptable in any amount, in either direction. When in doubt, declare it, an entry in the register costs nothing.

5. Donations and sponsorship

We do not make political donations. Charitable donations and sponsorships are made only to legitimate organisations, transparently, recorded, and never as a means of influencing a decision.

6. Your responsibilities

- Do not offer, give, solicit or accept a bribe, ever, for any reason.
- Declare gifts and hospitality as this policy requires.
- Watch for red flags: requests for unusual payment routes, pressure to skip checks, unexplained generosity around a decision.
- Report concerns immediately, to the Director, or through the Whistleblowing Policy on 0161 524 1715 if you prefer a confidential route. The law and this policy protect you for raising a genuine concern.

7. Breaches

A breach of this policy by an employee is gross misconduct. A breach by a supplier, client contact or placed worker ends the relationship and, where the law requires, is reported to the authorities. We would rather lose business than win it improperly.

8. Records, training and review

The gifts and hospitality register is maintained by the Director and reviewed annually alongside this policy. Anti-bribery forms part of staff induction and periodic refresher training.