

Anti-Bribery and Corruption Policy

Policy Statement & Purpose

Bromford Housing Group and its subsidiaries (Bromford) conduct 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, and implementing and enforcing effective systems to counter bribery and corruption.

We will uphold all laws relevant to countering bribery and corruption in accordance with the Bribery Act 2010 (the Act).

This policy explains:

- (a) the importance of the policy and what it identifies
 - (b) the process for adhering to the policy
 - (c) what to do in the event of breaching the policy
-

Contents

- 1. Scope
 - 2. Reference Materials
 - 3. Principles
 - 4. Responsibilities
 - 5. Legislative or Regulatory Requirements
 - 6. Assurance Framework
-

Scope

The provisions of this policy will apply to all colleagues and 'associated persons' of Bromford. 'Associated persons' is a broad term that applies to both individuals and businesses. It includes, but is not limited to, colleagues, agency workers, contractors and other persons/bodies that perform services for or on behalf of Bromford.

Failure to comply with this policy may result in disciplinary action being taken against any colleagues concerned, or the termination of contracts with associated persons working for, or on behalf of Bromford.

This Policy covers Bromford Housing Group and its subsidiaries.

Reference Materials

List of Referenced Documents
Anti-Fraud Policy
Anti-Money Laundering Policy
Bromford Group Financial Regulations
Code of Conduct Policy
Declaration of Interest Procedure
Disciplinary Policy
Fraud Response Plan
Gifts and Hospitality Procedure
Recruitment Policy
Whistleblowing Policy

Principles

What is bribery?

A bribe is an inducement or reward offered, promised, or provided in order to improperly gain any commercial, contractual, regulatory, or personal advantage, which may constitute an offence under the Act, namely:

- giving or offering a bribe;
- receiving or requesting a bribe; or
- bribing a foreign public official.

Bromford may also be liable under the Act if it fails to prevent bribery by an associated person.

What is corruption?

Corruption is the abuse of entrusted power for personal advantage, examples include:

- activity that is beyond the position or remit of a colleague, or
- benefits obtained for an colleagues' personal gain, rather than a legitimate business gain for Bromford.

What is not acceptable

It is not acceptable for any colleague or associated person (or someone acting on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or Bromford will improperly be given a business advantage, or as a reward for a business advantage already improperly given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure;
- accept payment from a third party where it is known or suspected that it is offered or given with the expectation that the third party will improperly obtain a business advantage;
- accept a gift or hospitality from a third party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by Bromford in return;

-
- threaten or retaliate against a colleague who has refused to commit a bribery offence or who has raised concerns under this Policy; or
 - engage in any activity that might lead to a breach of this Policy.

Facilitation payments

Bromford does not make, and will not accept, facilitation payments of any kind, such as small, unofficial payments made to secure or expedite a routine action, or payments made in return for a business favour or advantage.

Declarations of Interest

The Declaration of Interest Procedure ensures we protect Bromford and our colleagues by making appropriate declarations. This enables Bromford to receive assurance:

- colleagues are open and transparent about their relationships and do not gain inappropriate benefit or are influenced by these; or
- we do not treat, or appear to treat, colleagues, or others they are connected with, more favourably than anyone else.

All Bromford colleagues is required to complete the mandatory Declarations of Interest reading on Learning Lounge and acknowledge they understand and will adhere to the requirements.

Gifts and Hospitality

The Gifts and Hospitality Procedure does not prohibit appropriate gifts and hospitality (given and received). The Gifts and Hospitality Procedure provides further detail about the giving and receiving of gifts and hospitality and should be read and followed by all colleagues. The procedure covers; offers of gifts or hospitality to or from any person, organisation or other third party who we currently, or may, do business with and includes, for example, suppliers, contractors, professional advisers, other stakeholders, and customers.

The Governance team monitors a Gifts and Hospitality Register. It is reviewed by the Head of Governance (Company Secretary) as individual entries are received and is reviewed on an annual basis. Any matters of concern will be escalated and investigated accordingly. The register records the date, estimated monetary value, donor and recipient of the gifts or hospitality, including any which have been approved, refused, or returned.

Code of Conduct

Bromford expects the highest standards of conduct from colleagues and associated persons, this includes conducting business in professional matters and conflicted personal, business, financial and commercial relationships. Further detail is provided in the Code of Conduct Policy.

Communication

Our zero-tolerance approach to bribery and corruption will be communicated to colleagues and associated persons, and where appropriate, be communicated to third parties, such as suppliers, contractors, and business partners.

Training

Training of our zero-tolerance approach to bribery and corruption is provided via eLearning, is mandatory for all colleagues, and is undertaken every two years. In addition, colleagues in higher risk areas of the business, such as procurement, investment and construction and other related activities will require more thorough training.

Monitoring and review

The Governance Team monitors the effectiveness and reviews the implementation of this policy at appropriate intervals, considering its suitability, adequacy, and effectiveness. Any

improvements identified are made as soon as practicable. Internal control systems and procedures is also subject to review in order to provide assurance that they are effective in countering any risks of bribery and corruption.

Responsibilities and raising concerns

The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all colleagues.

All colleagues are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Colleagues are required to notify as soon as possible to the Fraud and Financial Crime Specialist, or to report concerns in accordance with the Whistleblowing Policy, if it is believed or suspected:

- a conflict with this policy has or may occur;
- if a colleague is offered or asked to make a bribe, or suspect that this may happen in the future;
- where a colleague believes that they are a victim of another form of unlawful activity.

Any colleague who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct.

We also reserve our right to terminate our contractual relationship with associated persons that breach this policy.

If a third-party is aware of any activity by any colleague or associated person which might lead to, or suggest, a breach of this policy, they should raise their concerns with the Fraud and Financial Crime Specialist.

Responsibilities

The **Board** has overall responsibility for this policy.

The **Audit and Risk Committee** is responsible for reviewing the policy, making recommendations to the Board, and maintaining oversight of risk management and internal control processes.

The **Chief Risk Officer** and the **Governance Team** are responsible for the preparation of this policy, oversight of its implementation, and maintenance of supporting risk management and internal control systems and processes.

Executive and Functional Directors are responsible for the day-to-day operation of the policy and ensuring it is adhered to.

All **colleagues** are responsible for acting in line with the principles of this policy and associated methodology, tools, and systems.

Legislative or Regulatory Requirements

By following this summary guidelines, it ensures that Bromford adheres to:

- Bribery Act 2010
-

Assurance Framework

Bromford has adopted the 'three lines of assurance' model. It is built upon Bromford's strong control culture and organisational delegation of responsibility. It is the responsibility of managerial and supervisory colleagues within business units who use the policy to ensure that the policy is communicated and effectively implemented, and to ensure colleagues are aware of their responsibilities. Adhering to policy and underpinning procedures ensures we continue to operate within our overall risk appetite as a business.

Document Details

Owner: Sarah Beal – Head of Governance, Company Secretary
Approved By: Audit and Risk Committee
Date of Approval: September 2023
Next Review Due: September 2026
Policy Version: 2.0
Share to website: Yes

Version Control

Renewal Date	Version	Approved By	Comments
09 2023	2.0	Audit & Risk Committee	New policy name, new template applied and content subject to revision