



BRIBERY POLICY

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1. Introduction

- 1.1 ng homes values its reputation for ethical behaviour and financial probity. Any kind of bribery – whether offered or received, whether corporate or individual - would be highly damaging to our image and reputation.
- 1.2 This Policy is a group policy, applicable to ng homes and its subsidiaries. The Policy sits alongside our codes of conduct for board members and employees and related governance policies, including our Policy on Gifts, Hospitality and Donations. Many of our operational policies are also relevant to how we safeguard against bribery, for example our policies on housing applications and lettings; procurement and contracts management; and staff selection and recruitment.

2. The Bribery Act 2010: How we will meet our obligations

- 2.1 The Bribery Act 2010 defines a bribe as **'a gift or reward given, offered or received to gain any business, commercial or personal advantage'**.
- 2.2 The 2010 Act established several offences relating to bribery, including:
- Offering, promising, or giving a bribe (individuals and organisations)
 - Asking for or receiving a bribe (individuals and organisations)
 - A corporate offence of failure to prevent bribery.
- 2.3 The corporate offence includes offences committed on behalf of an organisation by persons associated with it, for example agents or service providers. An organisation may have a full defence against the corporate offence, if it can show that it had adequate procedures in place to prevent bribery, based on 6 principles:

Bribery Act Principles	How we will address the Principles
1. Procedures should be proportionate to the organisation's size and activities	Our risk assessment is based on our activities as a social landlord, rather than a generic bribery risk assessment
2. There should be a top-level commitment within the organisation to prevent any form of bribery	Our Board has approved our Policy. Our senior officer will be responsible for promoting compliance.
3. A risk assessment should be carried out	We have prepared a risk assessment in developing our Policy and we will review this periodically
4. Due diligence should be undertaken in respect of agents or suppliers of services	We will obtain assurance about the financial and organisational status of agents and others. We will make available our Policy to organisations working on our behalf, making clear that any kind of bribery will not be tolerated and will lead to termination of

Bribery Act Principles	How we will address the Principles
	contracts.
5. Anti-bribery policies should be widely communicated	Our Policy will be communicated to all board and staff members, and to agents, contractors and consultants.
6. Anti-bribery procedures should be monitored and reviewed	Our Audit Committee will be responsible for monitoring and reviewing the Anti-Bribery Policy, reporting directly to the Board

3. Policy Statement

- 3.1 ng homes has zero tolerance to all forms of bribery and corruption. The Board acknowledges its responsibility to provide leadership and has approved the following policy statement:

ng homes prohibits:

Offering, giving, soliciting or accepting any bribe, whether cash or another kind of inducement;

To or from

Any person or company, whether they are a public official or body or private person or company;

By

Any employee, Board member, agent or other person or body acting on our behalf;

In order to

Gain any commercial, contractual, financial or regulatory advantage for ng homes in a way that is unethical;

Or in order to

Gain any personal advantage, monetary or otherwise, for the individual or anyone connected with the individual.

- 3.2 We will communicate this policy statement to all Board and staff members, and to agents, contractors or consultants providing services on our behalf.

4. Policy Implementation

Ethical Standards

- 4.1 We expect the highest standards of honesty and integrity from Board and staff members, our partners and contractors.
- 4.2 Rules relating to conduct and disciplinary action are set out in our employment terms and conditions and in the respective codes of conduct for Board and staff members.
- 4.3 Our policies set out the payments, benefits, gifts and hospitality that staff and

Board members may properly receive. Staff and Board members should exercise extreme caution in accepting anything that is not expressly permitted by these policies or that has not been approved by senior management or the Board.

Financial and other controls

4.4 Staff and Board members must comply with our controls for ensuring transparent and appropriate decision-making. These controls are subject to external and internal audit scrutiny, and include:

- The Scheme of Delegated Authority and Financial Regulations
- Segregation of invoice approval and payment authorisation
- Recording of all income and expenditure
- Completion of declarations of interests by all Board and staff members
- Policy and procedures for gifts, hospitality and donations
- Policy and procedures for payments and benefits
- Claims for reimbursement of expenses
- Policies and procedures for repairs, maintenance and development procurement.

Information from agents, consultants and contractors

4.5 Appropriate information should be obtained in relation to prospective agents, consultants and contractors, in accordance with ng homes' selection and appointment procedures (e.g. references, financial statements, accounts).

4.6 Agents, consultants and contractors should be advised of ng homes Anti-Bribery Policy. They should be advised, a) of the need to comply with the Policy when acting on ng homes' behalf, and b) that any allegations of bribery will be subject to investigation and termination of contractual arrangements.

Reporting Concerns

4.7 We encourage employees to report any suspicions of bribery to line managers, senior management or the Audit Committee, in strict confidence where necessary using the Policy on Whistleblowing. The following list gives examples of what to report but is not exhaustive:

- You are offered an unusually generous gift or lavish hospitality;
- You are offered substantially discounted fees for supply of goods or services to you as a private individual;
- You are offered a payment in cash or some other type of inducement if a contract is awarded to a particular contractor/supplier;
- A supplier asks you to provide an invoice or receipt when no money is payable or has been paid;
- Someone offers to pay you cash to provide employment for a friend or relative;

- Someone offers to pay you cash in return for receiving a house or other service;
- You notice that ng homes has been invoiced for a payment that seems excessive in relation to the service / goods provided;

4.8 We will fully investigate any instances of alleged bribery and will assist the Police and other appropriate authorities in any resulting investigation. We will take firm action against any individual(s) involved in bribery.

5. Risk Assessment

5.1 ng homes' exposure to the risk of bribery is reduced by a number of factors:

- Our business is conducted 100% in the UK
- We are subject to – and comply with – statutory accounting standards, with all of our income and expenditure subject to external audit and public reporting
- We work in a highly regulated sector, and we have well-established and independently audited policies/procedures for committing expenditure and making payments
- We have an Audit Committee and an ongoing programme of internal audit.

5.2 Some parts of our business have an inherently greater risk exposure due to the nature of the activities undertaken or services provided. These are:

- Letting of the houses we own and manage
- Recruitment and selection of staff
- Procurement risk – notably the appointment of professional consultants and contractors and organisational purchasing.

5.3 Our risk assessment describes these higher risk areas, the controls in place, and further action that is likely to be needed as a consequence of this Policy.

6. Policy Implementation and Monitoring

6.1 All Board and staff members are responsible for reading and understanding this Policy, and for contributing to its implementation. The CEO will have overall responsibility for ensuring this Policy is put into effect.

6.2 We will make available a copy of the Policy to all consultants and contractors who shall be responsible for operating in accordance with it when delivering services on behalf of ng homes.

6.3 Implementation of the Policy will be monitored by the Audit Committee, as part of its remit for scrutiny of internal controls. The Audit Committee will be made aware of any breaches of the Policy and may recommend to the Board any actions required, either in response to individual cases or in relation to the Policy as a whole.