



HAVEBURY HOUSING PARTNERSHIP

ANTI-BRIBERY & CORRUPTION POLICY (FIN 013)

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HHP ANTI-BRIBERY POLICY

1. Introduction

The Havebury Housing Partnership ("the Group "We" or "our") is committed to maintaining high standards of legal compliance, ethical conduct, and integrity in all business activities. This Anti-Bribery & Corruption Policy outlines our stance on preventing bribery, fraud, and related offences, and establishes a framework for compliance. We adopt a zero-tolerance approach to bribery and fraud involving any board members, employees, agents, consultants, contractors, suppliers, or any individual acting on behalf of the Group or its subsidiaries.

2. Scope of the policy

- 2.1. This policy applies to all board members, employees, and associated persons acting for or on our behalf. Compliance with this policy is mandatory. Breaches may lead to serious disciplinary, contractual, and criminal consequences, as well as reputational damage to us.
- 2.2. **Definitions:**
 - a) **Employee:** Includes all full-time, part-time, casual, permanent, and temporary staff.
 - b) **Associated Persons:** Includes contractors, consultants, suppliers, agents, and agency staff engaged by us.
- 2.3. Under the Bribery Act 2010, we may face criminal liability for unlawful acts by our board members, employees, or associated persons. All must familiarise themselves with this policy and comply with its provisions, as well as any updates issued periodically.
- 2.4. This policy should be read alongside:
 - a) Schedule of Delegated Authority (GP 008)
 - b) Financial Regulations and Standing Orders (FIN 001)
 - c) Terms & Conditions of Employment
 - d) Member Service Agreements
 - e) Whistleblowing Policy (GP 005)
 - f) Probity Policy (GP 020)
 - g) Code of Conduct

3. Board Commitment

We encourage individuals to report any reasonable suspicions of bribery, fraud, or related offences. Reports can be made through our whistleblowing policy. No employee will face repercussions for reporting concerns in good faith, unless allegations are found to be malicious.

4. Overview of the Bribery Act 2010

The Bribery Act 2010, effective from 1 July 2011, simplifies the legal framework and strengthens anti-bribery measures in the UK. Key provisions include:

4.1. Bribery Offences

- a) Offering, promising, or giving a bribe.
- b) Requesting, agreeing to receive, or accepting a bribe.
- c) Bribing a foreign public official.
- d) The corporate offence of failing to prevent bribery.

A bribe is defined as a gift, payment, or reward given to gain a business, commercial, or personal advantage.

4.2. **Corporate Liability**

We may be held strictly liable for bribery committed by associated persons acting on our behalf, irrespective of our knowledge or intent. Compliance with this policy is therefore essential.

4.3. **Penalties**

Breaches of the Act may result in:

- a) Unlimited fines for the Group.
- b) Disqualification from public contracts.
- c) Individual penalties, including imprisonment (up to 10 years) and fines.

5. **Adequate Procedures: Six Management Principles**

To defend against corporate liability, we adhere to the Ministry of Justice's six principles:

- a) **Proportionality:** Procedures must align with the size, activities, and risks faced by the organisation.
- b) **Top-Level Commitment:** The leadership fosters a culture where bribery is unequivocally unacceptable.
- c) **Risk Assessment:** Regular assessments identify and address bribery risks.
- d) **Due Diligence:** We verify the integrity of those we conduct business with.
- e) **Communication:** Anti-bribery policies are embedded across the organisation and communicated effectively.
- f) **Monitoring and Review:** Anti-bribery measures are periodically audited to ensure effectiveness.

6. **Prohibited Conduct**

6.1. Employees and associated persons must not:

- a) Offer, promise, give, solicit, or accept any bribe, whether monetary or non-monetary.
- b) Maintain "off-book" accounts.
- c) Engage in facilitation payments or kickbacks.

6.2. Any gifts, hospitality, or entertainment must be modest, proportionate, and pre-approved. All such instances must be recorded in the hospitality and gifts register.

7. **Reporting and Investigation**

7.1. Suspected bribery must be reported immediately to the Director of Resources & Company Secretary. Incidents will be investigated thoroughly and documented in the fraud and bribery register.

7.2. **Whistleblowing Protections apply:** Employees reporting concerns in good faith will not face retaliation.

8. **Training and Awareness**

We will provide regular training to employees and associated persons to ensure they understand their responsibilities. Zero-tolerance messaging will also be communicated to external partners.

9. Review and Compliance Monitoring

Compliance with this policy will be reviewed annually. The Director of Resources & Company Secretary will report findings to the People, Remuneration and Nominations Committee.

10. Conclusion

We remain committed to combating bribery and corruption in all its forms. d corruption in all its forms. All employees and associated persons are expected to uphold the principles outlined in this policy to protect the integrity and reputation of the organisation.