



Anti-Bribery Policy

1.0 Purpose and scope

Notting Hill Genesis (NHG) does not tolerate bribery or corruption in any form. This policy sets out how we will identify and respond to suspected bribery and protect our staff. This policy should be read in conjunction with Staff and Board Member Codes of Conduct and Whistleblowing Policy and applies to everyone working for or associated with Notting Hill Genesis including all employees, Board and Committee members.

2.0 Definitions

Bribery: Bribery is when a person offers, gives, receives or solicits a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act improperly.

The Bribery Act 2010 came into force on 1 July 2011. There are four possible offences:

- offering, promising, or giving bribes,
- requesting, agreeing to receive, or accepting bribes,
- bribery of a foreign public official
- failure of a commercial organisation to prevent bribery.

Corruption: Corruption is a dishonest or fraudulent act by a person in a position of power and typically involves a form of financial or other material gain.

Gifts: These are defined as any item of value provided or offered for personal benefit at a cost that is less than its commercial value or, no cost.

Hospitality: Covers a wide spectrum and can include: Free meals, drinks, receptions, meetings sponsored by associates, hospitality tents at shows, exhibitions or conferences, music and cultural events, sport and leisure events, hotel accommodation and holidays.

Facilitation Payments: Payments made to public officials to speed up actions the officials are already duty-bound to perform.

Political or Charitable Donations: A financial payment or loan, or a payment in kind made to support a political or charitable cause.

Payment in kind: A payment in kind includes gifts, services, advertising, attendance at fundraising events or support for a think tank with political connections.

3.0 Our position on bribes

We do not tolerate bribery or corruption in any form.

You should never offer, give, request or accept any bribe, whether in cash or by way of any other type of illicit payment, to or from any person or company, wherever they are situated and whether they are:

- a public official or body
- a private person
- a company
- any individual employee or other person or body acting on NHG's behalf
- another NHG employee, board member or volunteer (this exclusion does not extend to private gifts between individuals or within teams such as wedding/leaving presents)
- in order to gain any commercial, contractual or regulatory advantage for NHG in a way which is unethical or in order to gain any personal advantage, financial or otherwise for the individual, or anyone connected with parties.

You should never engage in any internal action which encourages, implies, gives, tolerates or promises an unfair, unlawful, improper or unethical advantage to any individual, group or organisation, regardless of whether there is financial inducement or not.

You should never accept a bribe to encourage a favourable investment or regulatory decision, property transaction or other business outcome.

A bribe does not need to be money – it can be any form of advantage, for example the award of a contract, hospitality or gifts or an offer of employment. A recipient of a bribe does not need to benefit personally nor does the benefit need to be received – an offer or request is an offence.

Any offer of or request for a bribe should be reported to senior management immediately.

Everyone in a position of management within NHG has an obligation to not allow others to misuse their position. If an offence is committed with the consent or connivance of a manager, they could be personally held liable and subject to formal action.

Any NHG employee or associated person who is discovered to be giving or taking bribes or any other acts of corruption, will be subject to disciplinary action. This may ultimately lead to dismissal and, if appropriate, criminal proceedings.

Please refer to NHGs Code of Conduct Policy for more information around Gifts and Hospitality.

4.0 Facilitation Payments

NHG will never accept improper payments to obtain new business, retain existing business or secure any improper advantage. You must never offer or accept facilitation payments, whether directly or through a third party.

5.0 Donations

In accordance with the Code of Conduct (for staff and board members, respectively), political donations by or on behalf of NHG are prohibited. Charitable donations by or on behalf of NHG may only be made to NHG's' nominated charities unless agreed by the Company Secretary.

6.0 How to raise a concern

You are required to report any incident or behaviour that does not adhere to this policy and is an attempt to influence NHG. You must also report if you are offered a bribe by a third party, are asked to make one, or suspect that this may happen in the future. This is the case even if an offer is not accepted.

There will be occasions when it is not clear if someone is attempting to offer or solicit a bribe. You are encouraged to raise a concern even in doubtful cases. If you are unsure about whether a course of action is right or wrong, ask yourself the following questions:

- Would you be happy if your colleagues or the press knew about it?
- Would you be proud to tell your friends and family about it?
- Does it sit well with our values?

If the answer is 'no' to any of these questions, seek advice immediately.

All concerns must be reported to the Compliance Manager in Governance, or in their absence the Company Secretary. Alternatively, you may raise a concern through the confidential whistleblowing policy.

6.0 Reference

Internal documents

- Financial regulations
- Anti-fraud policy
- Whistle-blowing procedure
- Codes of conduct (for staff and board members, respectively)
- Staff contracts of employment

Document control

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Version Control

The version number should increase by 0.1 if the changes are minor, or by 1.0 if there have been significant changes.

Date	Amendment	Version
April 2018	New Notting Hill Genesis policy created.	1.0
March 2021	Revised role titles and removed reference to legacy policies and G&H	1.1