



ANTI-BRIBERY POLICY

RESPONSIBLE DIRECTOR: DIRECTOR OF FINANCE AND RESOURCES

APPROVING OFFICER: ASSISTANT DIRECTOR OF FINANCE

RESPONSIBLE OFFICER: FINANCE MANAGER - SYSTEMS

LAST UPDATE: OCTOBER 2025

NEXT UPDATE: OCTOBER 2027

1. Purpose & Definitions

- 1.1. The Bribery Act 2010. The Bribery Act came into force on 1 July 2011, repealing and replacing the old laws on bribery with a new comprehensive anti-bribery code.
- 1.2. The NCHA Anti-bribery Policy (the 'Policy') shall ensure the Group complies with the Bribery Act 2010, considers the risk of bribery and deals with it appropriately.
- 1.3. Under the Bribery Act 2010, there are four offences:
 - Bribing another person– the offering, promising or giving of an advantage.
 - Being bribed – requesting, agreeing to receive or accepting an advantage.
 - Bribing a foreign public official.
 - The "corporate offence", where a commercial organisation fails to prevent persons performing services on its behalf from committing bribery.
- 1.4. A bribe is a gift given to influence the recipient's conduct. It may be; money, goods, property, privilege, an object of value, advantage or any or other inducement. The key element being this inducement is designed to influence the actions of an official in the organisation.
- 1.5. This Policy should be read in conjunction with:
 - Code of Conduct
 - Fraud Policy
 - Gifts & Hospitality Policy
 - Whistleblowing Policy
 - Standing Orders and Financial Regulations
 - Financial Procedures Manual
 - Risk Management Framework

2. Policy and Compliance with the Bribery Act

- 2.1. NCHA will not tolerate bribery under any circumstances and shall maintain an Anti-Bribery Policy.
- 2.2. NCHA will consider the risk of bribery and deal with that risk appropriately.
- 2.3. Appropriate processes have been built into relevant procedures to deal with the risk of bribery and shall be reviewed on a timely basis.
- 2.4. Soliciting, accepting, offering or giving bribes is considered by NCHA to be gross misconduct and will be dealt with accordingly as set out in its People policies.
- 2.5. NCHA shall ensure that all colleagues and organisations working with the NCHA Group understand that our policy is not to tolerate bribery in any circumstances.
- 2.6. All colleagues will be made aware of the Policy and the Policy included in the Induction for all new starters.

- 2.7. All NCHA colleagues, Board Members and Committee Members have a duty to avoid acting in a way that might lead to or suggest a breach of this Policy.
- 2.8. Anyone who believes that they have identified evidence of bribery, or of an intention to bribe, must report this immediately to a member of the Senior Leadership Team. If preferred by the colleague the matter may be reported in line with NCHA's Whistleblowing Policy.
- 2.9. The NCHA Code of Conduct states that the offering, promising, giving, requesting, agreeing to receive or accepting a bribe is not permitted. NCHA may consider this to be gross misconduct.

3. Consideration of Bribery risk

- 3.1. The Bribery Act requires that adequate consideration is given to the risk of bribery and that adequate procedures are put in place to deal with the risk.
- 3.2. In order to ensure NCHA's Policy remains robust and appropriate a consideration of risk is undertaken. This consideration identifies that the key bribery risks to the Group being in relation to tendering and contract awards.
- 3.3. Risks could be exacerbated if colleagues are unaware of the Policy, most notably that the Group considers bribery gross misconduct.
- 3.4. As a result of the risk consideration, the following are within the Group's Financial Regulations:
 - The Group does not condone or accept bribery and will take whatever measures needed to ensure that bribery does not affect the Group.
 - NCHA's procurement systems, processes and procedures are designed to mitigate the risk of bribery and segregate duties between the contract managers and independent procurement function.
 - When tendering contracts they must be let by means of the procurement process defined in the Financial Regulations (section 2.13) which depends on the contract value.

4. Review of Anti-bribery procedures

- 4.1. NCHA will ensure there is a rolling review of all its policies and procedures.
- 4.2. Should new measures be identified as a result of the work of Officers or the Risk Panel then these shall be included in the review process and updated in related policies and procedures accordingly.
- 4.3. The consideration of bribery risks forms part of the rolling risk review carried out by the Group's Risk Panel.
- 4.4. The Anti-Bribery Policy will be reviewed every 2 years or at any time that a review is required determined by the assessment of the risk. The Policy will be approved by the Audit & Risk Committee.

- 4.5. To ensure NCHA's stance on bribery is communicated to existing colleagues, this Policy shall remain within the list of policies available on the intranet (Igloo) and included in required briefings to colleagues at induction.
- 4.6. Following changes to and approval of the Policy by Audit & Risk Committee, this shall be communicated to colleagues on the Intranet or Team Briefs.