

ANTI-BRIBERY POLICY

Date Reviewed	April 2026	Next Review Date	April 2029
Consultation	Executive Team	Reviewed By	Sharon Woods
EIA	Complete	Responsible Officer	Head of Corporate Services
DPIA	Complete	Approval By	Group Audit Committee

1. Introduction

It is Black Country Housing Group's (BCHG) policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and are committed to acting professionally, fairly and with integrity in all our relationships wherever we operate and to implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption. We remain bound by the laws of the UK, including the Bribery Act 2010.

Fraud, bribery, corruption and money laundering are recognised as related forms of economic crime. Where issues overlap, relevant BCHG policies will apply together.

2. Purpose

The purpose of this policy is to:

- Set out the responsibilities for all Executives, Heads of Service, managers, colleagues and board members in observing and upholding our position on bribery
- Provide information and guidance to colleagues on how to deal with bribery issues

In this policy, third party means any individual or organisation you come into contact with during the course of your work for BCHG.

3. Related Documents

- Anti-Fraud Policy
- Anti-Money Laundering Policy
- Disciplinary Policy
- Whistleblowing Policy & Procedure
- Whistleblowing Policy for Non-Executive Directors
- Code of Conduct for Employees
- Code of Conduct for Non-Executive Directors
- Speak Out Guidance
- Probity Policy
- NHF Code of Governance 2020
- BCHG's Rules

4. Definition of Bribery

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. The Bribery Act contains three types of bribery:

- bribing another person
- accepting a bribe
- bribing a foreign official

5. Responsibilities

All Executives, Heads of Service, managers, colleagues and board members must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for BCHG. All are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify the Director of Resources as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a tenant were to offer you a gift which could be perceived as gaining them an advantage with BCHG. Any employee or board member who breaches this policy will face disciplinary action, which could result in dismissal or removal.

Specific responsibilities are:

The Board

- Operate an anti-bribery culture
- Maintain effective risk management and internal control systems
- Conduct its own affairs in accordance with its rules, the Board Code of Conduct, the Code of Governance and the Regulatory Standards

Group Audit Committee

- Ensure the effectiveness of internal, including financial, controls, assurance and compliance
- Review internal audit reports and findings of external audit
- Review arrangements for whistleblowing.

Executive Team & Executive Board

- Ensure effective policies, procedures and systems are in place for detecting and reporting bribery
- Foster a culture of honesty and openness amongst all colleagues, and ensures colleagues are aware of expectations relating to their professional conduct and the requirements of this policy
- Ensure all colleagues have the required level of knowledge and understanding of the range of policies, procedures and systems that are relevant to the Group's anti-bribery approach
- Ensure all colleagues and board members receive appropriate training that enables them to identify bribery or attempted bribery
- Ensure the notification requirements of regulators are met
- Liaise with police and other relevant authorities in relation to any inquiries into alleged bribery offences.

All Colleagues

- Report as soon as possible any suspicions of bribery or attempted bribery they encounter; and otherwise
- Act with integrity and propriety, within the law, and in accordance with relevant policies, systems and procedures

Specific roles in relation to whistleblowing are set out within the NED and Colleague Whistleblowing Policies.

6. Raising a Concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage with the Director of Resources in accordance with BCHG's Whistleblowing Policy. If you are unsure whether a particular act constitutes bribery, or if you have any other queries, these should be raised with the Director of Resources.

If your concern involves the Director of Resources, you should contact the Chief Executive. If your concern regards the Chief Executive, you should contact the Chair of the BCHG Board. If your concern regards the Chair of the BCHG Board, you should contact the Senior Independent Director (SID).

Where bribery concerns also involve the proceeds of crime or give rise to suspicions of money laundering, escalation must follow the Group's Anti-Money Laundering Policy.

7. What to do if you are a Victim of Bribery

It is important that you tell the Director of Resources as soon as possible if you have been offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

8. Protection

Those who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

BCHG are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

9. Hospitality & Gifts

Under no circumstances is it acceptable to accept cash gifts. You may not accept any personal gifts worth a significant amount of money this includes things like offers of holidays or other benefits instead of money. It is acceptable to receive low-priced items such as chocolates and flowers.

If you have to refuse a gift, you should be polite but firm, and let the person know that you are bound by this Code of Conduct.

You may not accept hospitality that might lead to a misunderstanding about the way you carry out your work or make decisions. For example, this might be particularly inappropriate if you were offered an expensive meal or a gift by a supplier around the time that BCHG was going to agree, sign or tender a contract.

All employees must declare any gifts or hospitality that has been offered or accepted and it must be recorded in the Hospitality Register which is held by the Company Secretary.

The Register is available for review at all times by the Group Audit Committee.

10. Data Processing

All personal data processed under this policy will be handled in accordance with the Data Protection Act 2018, UK GDPR and the Group's Data Protection Policy.

11. Equality Diversity & Inclusion

This Policy has been equality impact assessed and has been judged to be fair and in line with BCHG's commitment to Equality and Diversity and Inclusion.