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Anti-bribery and corruption policy

This policy sets out Bromford Flagship's approach to addressing bribery and corruption in support of delivering safe, fair, and responsive services to our customers. It is underpinned by legal duties, regulatory expectations, and a commitment to fairness, accountability, and transparency.

Department	Risk
Policy Owner	Financial Crime and Insurance Manager
Approved Date	November 2025
Date for Review	November 2028
Approving Body	Audit and Risk Committee
Associated Legislation/Regulation	Bribery Act 2010 Criminal Finances Act 2017 Data Protection Act 2018 Economic Crime and Corporate Transparency Act 2023 Fraud Act 2006 Human Rights Act 1998 Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 Public Interest Disclosure Act 1998 Proceeds of Crime Act 2002
Legal Advice From	None required
Equality Impact Assessment Date	22 October 2025
Version Number	1.0
Publication Status	Internal and External

1. Purpose / Principles

Bromford Flagship is committed to preventing bribery and corruption and fostering a culture of honesty, integrity, and transparency. We maintain a zero-tolerance approach to all financial crime and expect all colleagues to act with honesty and always uphold the highest ethical standards.

2. Scope

This policy applies to all confirmed or suspected instances of bribery and corruption involving Bromford Flagship colleagues, as well as any individuals or organisations with whom we maintain a business relationship, this includes associated persons working for, or on behalf of Bromford Flagship.

This policy forms part of our broader financial crime framework and reinforces our commitment to fostering a workplace culture grounded in integrity, transparency, and ethical conduct. These principles are upheld consistently and without exception across all areas of our business.

3. Roles / Responsibilities

Board has overall responsibility for this policy.

The Board delegate responsibility for this to the Audit & Risk Committee (ARC).

ARC has responsibility for the following:

- Reviewing this policy to ensure its continued relevance and effectiveness
- Making recommendations to the Board regarding financial crime risk management and related controls
- Maintaining oversight of financial crime risk management and internal controls
- Approving the annual financial crime workplan and reviewing progress
- Approving the annual report to the Regulator of Social Housing (RSH), including the register of investigated financial crime investigations and detailing losses from financial crime activity

Executive Disclosure Committee (EDC) and Risk and Regulation Group (RRG) are responsible for the following:

- Reviewing periodic reports, financial crime related management information, and monitoring progress against the Financial Crime Workplan, as submitted by the Financial Crime and Insurance Manager

The Financial Crime and Insurance Manager is responsible for:

- Overall responsibility for the coordination and execution of all anti-financial crime activities across Bromford Flagship
- Leading the delivery and communication of financial crime prevention, detection, deterrence, and investigation initiatives, in alignment with the financial crime framework

- Providing regular reports, financial crime management information, and updates on progress against the financial crime framework

All colleagues are responsible for the following:

- Act in accordance with the principles outlined in this policy
- Demonstrate Bromford Flagship's values and behaviours consistently in their day-to-day activities
- Report immediately any suspicions or evidence of irregular, improper, or behaviours that indicate any form of financial crime
- Exercise propriety and accountability in the use of Bromford Flagship's resources, including the handling of funds and interactions with contractors, suppliers, and customers

4. Policy Content

What is bribery and corruption

Bribery is defined under the UK Bribery Act 2010 as the offering, promising, giving, requesting, or accepting of a financial or other advantage with the intention of inducing or rewarding improper performance of a relevant function or activity. This includes actions that breach expectations of integrity, impartiality, or trust.

Corruption refers more broadly to dishonest or fraudulent conduct by those in power, typically involving bribery, abuse of office, or manipulation of processes for personal gain.

Bromford Flagship is committed to investigating all instances of actual, attempted, or suspected bribery and corruption, and will take appropriate action to recover any funds or assets lost as a result. This policy reinforces Bromford Flagship's zero-tolerance stance on bribery and corruption and ensures that all colleagues understand their role in maintaining a transparent and trustworthy working environment.

Policy commitment

This policy underpins our commitment to ethical conduct and responsible governance by:

- Safeguarding colleagues, customers, third parties, assets, and resources from misuse or misappropriation
- Promoting a culture of honesty, integrity, and accountability across all levels of Bromford Flagship
- Ensuring compliance with legal, regulatory, and contractual obligations, including reporting requirements to the Regulator of Social Housing (RSH)
- Supporting a consistent and initiative-taking approach to bribery and corruption prevention, deterrence detection, investigation and seeking redress

We are fully committed to complying with the UK Bribery Act 2010 and maintaining the highest standards of ethical conduct. To support this commitment, we:

- Prohibit all forms of bribery and corruption, whether direct or indirect, across all areas of our operations

- Implement and maintain robust procedures to prevent bribery, in accordance with the Act's six guiding principles: Proportionality, Top-level commitment, Risk assessment, Due diligence, Communication (including training), and Monitoring and review
- Foster a culture of integrity, transparency, and accountability, ensuring that ethical behaviour is embedded in our decision-making and business practices
- Take appropriate disciplinary and legal action against any colleague or associated person found to be involved in bribery or corrupt activities

Examples of bribery and corruption
These examples are not exhaustive but are intended to highlight common scenarios that may breach the Bribery Act 2010:

- A colleague offers a regulatory or government official a gift or payment to influence the outcome of a regulatory inspection or to secure a business advantage
- A bribe is made through a third party, such as a consultant or agent, to conceal the true nature of the payment and its intended influence
- Providing or receiving excessive or lavish entertainment to with the intent to influence a business decision, especially where there is no legitimate business justification
- A procurement colleague or other colleague in a position to do so awards a contract to a company owned by a relative, bypassing fair tendering procedures and failing to declare a conflict of interest
- A colleague manipulates financial records to divert public or company funds for personal use or to benefit an external party
- A leader appoints a friend or family member to a role without following proper recruitment procedures, ignoring merit-based selection
- A colleague receives a hidden payment from a supplier in return for awarding them a contract or favourable terms
- A colleague deliberately withholds information or misleads internal or external investigators to protect themselves or others involved in corrupt activities

5. EIA statement

An Equality Impact Assessment was undertaken for this policy on 22 October 2025.

We recognise that we may not have identified all adverse impacts on one or more protected characteristics. We welcome any feedback on, or examples of, things that we may have overlooked so that we can continuously improve our policy.

6. Training statement

This policy will be trained out to all colleagues by e-learning for mandatory training every two years.

7. Measuring Effectiveness

The effectiveness of this policy will be measured through self-assessment and independent scrutiny by periodic internal audit reviews and oversight by Risk and Reporting Group, Executive Disclosure Committee and Audit and Risk Committee.

8. Review Period

This policy will be reviewed every three years by the Financial Crime and Insurance Manager or sooner in response to significant regulatory or organisational changes. Audit and Risk Committee approve this policy.

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Supporting documents

This policy is supported by:

- Equality Impact Assessment

Version Control

Version	Detail	Approved by	Date
1.0	New Bromford Flagship policy	Audit and Risk Committee	November 2025