Anti-Fraud, Bribery, Theft and Corruption Policy

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1 Policy information

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Contributors	Leadership Team
Approving body	SLH board, recommended from ARC
Responsible Director	Chief Finance Officer

2 Policy statement and scope

We are committed to preventing, detecting and responding to fraud, bribery, theft, corruption and money laundering. We conduct our business transparently and fairly, apply zero tolerance to bribery and will not knowingly work with organisations or individuals that do not share this commitment.

This policy applies to board and committee members, colleagues, tenants, agency staff, contractors, agents, other associated persons representing us or our subsidiaries, and anyone providing services under a contract or other agreement. In this policy they are referred to as individuals.

Everyone covered by this policy must act honestly, comply with relevant policies and controls, complete required training, and report any known or suspected wrongdoing immediately. Breaches may result in disciplinary or contractual action, removal from office, referral to regulators or law enforcement, recovery action and prosecution.

3 Definitions and legal context

Fraud is intentional deception for benefit or advantage. Under the Fraud Act 2006 it includes false representation, failing to disclose information and abuse of position. Fraud is regarded as gross misconduct and may result in dismissal.

The Criminal Finances Act 2017 also creates corporate liability where an associated person facilitates tax evasion and reasonable prevention procedures were not in place.

Bribery is offering, promising, giving, requesting or receiving a gift, reward or other advantage to influence or reward improper performance. The Bribery Act 2010 covers giving and receiving bribes, bribing a foreign public official and the corporate offence of failing to prevent bribery by an associated person. Organisations may face an unlimited fine and exclusion from public contracts; individuals may face a fine and imprisonment of up to 10 years.

Money laundering is disguising the criminal source of funds so they appear legitimate. Theft is dishonestly taking property, including cash, equipment, vehicles or data, without consent and with no intention of returning it. Corruption is the abuse of a position of authority or trust for personal benefit or the benefit of another person.

4 Our controls and expected conduct

4.1 Risk assessment and prevention

We will maintain checks, controls and procedures for SLH and its subsidiaries, supported by comprehensive and regularly reviewed fraud, theft, bribery and money laundering risk assessments. Controls will reflect the six Ministry of Justice bribery prevention principles: proportionality, top-level commitment, risk assessment, due diligence, communication, and monitoring and review.

Managers and Internal Audit will address control weaknesses identified through concerns or investigations. The Executive Leadership Team, or an authorised representative, may access relevant records, seek explanations and require company cash or property to be produced. Privileged access to information systems requires written authorisation from the Chief Executive and/or Chief Finance Officer and is governed by the Information Security Policy.

4.2 Financial controls, gifts and donations

- Expenses must comply with the relevant board and committee member, colleague or volunteer expenses policy, be properly recorded and normally be supported by receipts.

- Gifts and hospitality must comply with the Gifts and Hospitality Policy. All offers, whether accepted or declined, and all approved offers made on our behalf must be declared. Reasonable and proportionate hospitality is permitted, but anything intended to secure an advantage must be refused and reported immediately. Unofficial payments and kickbacks are prohibited.
- All payments to third parties must be recorded, receipted, reasonable, proportionate and clearly linked to legitimate goods or services.
- Charitable donations must be legal and ethical and require prior approval from the Company Secretary. We do not make political donations.

4.3 Third parties and procurement

We will apply risk-based due diligence to contractors, consultants, agents, partners, joint ventures and proposed mergers or acquisitions. Procurement and contractual arrangements will communicate our anti-bribery stance, require appropriate anti-bribery commitments and controls, identify ownership, conflicts and relevant adverse findings where proportionate, clearly state services and payments, and allow appropriate action, including termination, where bribery occurs. Colleagues involved in higher-risk activity, including procurement, will receive appropriate training.

4.4 Money laundering

The Head of Finance is the nominated officer for money laundering. We will verify identity, understand the source of funds, investigate unusual or high-risk transactions, retain records in line with retention requirements and train relevant colleagues. Suspicions must be reported to the nominated officer, who will consider whether a suspicious activity report should be made to the National Crime Agency. No individual should alert a person that a report or investigation is being considered.

5 Roles and responsibilities

- The Board sets the tone and approves this policy.
- The Audit and Risk Committee oversees internal control and risk management across SLH and its subsidiaries, monitors reported incidents and the fraud register quarterly, receives investigation and anti-bribery assurance, and reports to the Board at least annually.
- The Chief Executive and Executive Leadership Team ensure appropriate controls, risk assessments, training, investigations and remedial action. The Chief Executive decides whether a colleague should be suspended. Suspension is neutral and does not imply guilt.
- The Company Secretary maintains awareness of and compliance with this policy, provides advice, maintains the fraud register and approves charitable donations.

- The Head of Finance acts as the nominated money laundering officer and considers internal disclosures and reports to the National Crime Agency where required.
- All individuals must prevent, identify and report concerns, cooperate with investigations and attend required training.

6 Reporting concerns

Any suspected fraud, bribery, theft, corruption, money laundering, irregularity or breach of the Code of Conduct must be reported immediately to the Head of Finance or Chief Finance Officer. If that is not appropriate, report it to the Chief Executive, Chair of the Board or Chair of the Audit and Risk Committee. Concerns involving the Chief Executive must be reported to the Chair of the Board or Chair of the Audit and Risk Committee. The Speak Up Policy may also be used.

Do not confront the person suspected, conduct your own investigation, discuss the matter more widely or destroy, alter or remove evidence. Anonymous reports will be considered appropriately. Genuine concerns raised through the proper channels will be treated seriously and confidentially, and reporters are protected by the Public Interest Disclosure Act 1998.

The Chief Executive and/or Internal Auditor must be informed within one working day of the initial report and before an investigation begins. Confirmed actual or attempted incidents must be entered in the fraud register.

7 Investigation and action

The Executive Leadership Team will appoint an investigating officer. Where an allegation concerns a leadership team member or a board or committee member, the Chair of the Board will appoint the investigator. An independent auditor or other specialist may be appointed, and the Disciplinary Policy and supporting fraud response procedure will be followed as appropriate.

Investigations will be independent, proportionate, confidential and fully documented. Evidence must be secured and retained. Relevant individuals must cooperate. The police will be informed where there is evidence of a criminal offence, and the Chair of the Board and Chair of the Audit and Risk Committee will be kept informed of action taken.

Outcomes may include control improvements, disciplinary or contractual action, suspension, removal from office, recovery of losses, legal action and referral to the relevant authorities. Confirmed actual or attempted fraud will be recorded in the fraud register and reported to the Regulator of Social Housing where required. Bribery will be disclosed to the Serious Fraud Office where

appropriate, and suspicious money laundering activity will be reported to the National Crime Agency by the nominated officer.

8 Monitoring, review and framework

- The Audit and Risk Committee reviews the fraud register quarterly and receives reports on fraud, bribery, theft and actual or suspected money laundering.
- The Company Secretary coordinates required regulatory returns and maintains the fraud register.
- Internal audit and other assurance activity will test whether controls and anti-bribery procedures are operating effectively and whether improvements are required.
- This policy and the related risk assessments will be reviewed at least every three years, or sooner following significant legislative, regulatory, organisational or risk changes.
- An Equality Analysis has been completed. The organisational risk map includes fraud, bribery and money laundering risk.

8.1 Statutory and legislative framework

Key legislation and guidance includes the:
Fraud Act 2006; Bribery Act 2010; Theft Acts 1968 and 1978; Criminal Finances Act 2017; Money Laundering Regulations 2017; Proceeds of Crime legislation; Public Interest Disclosure Act 1998; Prevention of Social Housing Fraud Act 2013; Economic Crime and Corporate Transparency Act 2023; Data Protection Act 2018; Data (Use and Access) Act 2025; relevant housing, charities, companies and equality legislation; Regulator of Social Housing standards and fraud guidance; and applicable NHF governance and conduct codes.

8.2 Associated policies and procedures

This policy should be read with the:
Fraud, Bribery, Theft and Corruption Response Plan and Procedure; Probity Framework; Codes of Governance and Conduct; Standing Orders; Financial Regulations; Speak Up Policy; Gifts and Hospitality Policy; Declarations of Interest Policy; relevant expenses and volunteer policies; Procurement Policy and procedures; Sponsorship Policy; Disciplinary Policy; Information Security Policy; Tenancy Management Policy; Allocations and Tenure Policy; Customer Feedback Policy; Terms and Conditions of Employment; and SLH Rules.