

Anti-Bribery & Corruption Policy

Document ID/Version:	V1		
Executive Lead (Owner):	Group General Counsel		
Policy Author:	Assistant Director Legal Governance & Procurement		
Strategic alignment:	This policy reflects the requirements of the National Housing Federation Code of Conduct and promotes the principles of Integrity and Accountability which build the reputation and trust in the organisation.		
Review frequency:	Every 3 years	☒	Other (state period)
Previous review date:	N/A		
Date policy approved:	3 November 2025		
Policy approved by:	Group Common Board		
Next policy review date:	October 2028		
IMPACT ASSESSMENTS			
Equality Impact Assessment			
Completed? ☒	No ☐	Yes ☒	
	If not required, state reason:	The policy applies equally to all colleagues, regardless of protected characteristics, and does not result in differential treatment.	
Resident Impact Assessment			
1) Is this one of the agreed policies requiring resident consultation?	Yes ☐	No ☒	
2) If yes, please confirm resident consultation has taken place	☐	Briefly detail changes arising from resident feedback:	
APPROVAL - To show transparency and accountability, specify whether policies have been approved by the Board/Executive/Committee. Clear approval lines strengthen governance, ensuring assurance and accountability.			
Approval journey:	Executive Team	Committee	Board
	☒	Yes ☐	Committee name(s) Add name, otherwise state N/A
			☒
Which Regulatory Standard does this Policy support?	Economic		
	Governance & Viability	Rent	Value for Money
	☒	☐	☐
	Consumer		
	Neighbourhood & Community	Safety & Quality	Tenancy

	☐	☐	☐	☒
Associated legislation	Bribery Act 2010; Regulator of Social Housing: Governance and Financial Viability Standard 2015; NHF Code of Conduct 2022			
Associated procedures				
Where is this policy to be published?	Website	Intranet	Both	
	☐	☐	☒	

Anti-Bribery & Corruption Policy

1. Policy Statement

- This is a policy of Paradigm Housing Group Limited (t/a SettleParadigm). Any reference in this policy to “SettleParadigm” includes not only the Group Parent company, but also all its subsidiaries (Settle Group, Paradigm Homes Charitable Housing Association Limited, Paradigm Commercial Limited and Paradigm Commercial Services Limited).
- It is SettleParadigm’s 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.

2. Objectives, desired outcomes and strategic alignment

The objectives of this policy are to:

- confirm SettleParadigm’s commitment to eliminate bribery or corruption.
- confirm SettleParadigm’s commitment to the thorough investigation of any potential bribery or corruption.
- provide a framework for identifying and investigating bribery and corruption
- ensure we comply with all applicable regulation and legislation

3. Scope

- This Policy applies to Board/Committee members and colleagues and extends to any additional workforce such as agency staff, and any others who may be temporarily assigned to perform work or services for SettleParadigm.

4. Policy Principles

- **What is bribery?**
- A bribe is an inducement or reward (not necessarily financial) offered, promised, or provided to gain any commercial, contractual, regulatory, or personal advantage. This could include the offer of lavish gifts or hospitality.
- The Bribery Act contains three types of bribery:
 - Bribing another person

- Accepting a bribe
 - Bribing a foreign official
- An action is still classed as bribery regardless of whether the bribe is given directly or through a third party or whether is for the benefit of the recipient or someone else. The promise to give or agreeing to receive a bribe would be considered bribery.
- All staff, Board/Committee members, any additional workforce such as agency staff, and any other worker are required by the Bribery Act 2010 not to either directly or indirectly:
 - Offer, give, solicit, or accept any bribe, either in cash or any other form, to or from any person, company or other party. This applies no matter where that person is located and whether they are a public official or body, a private person or a company;
 - Give or retain any commercial, contractual or regulatory advantage through unethical or illegal means when conducting business on behalf of SettleParadigm.
- We will ensure that anti-bribery commitments are written into contracts with third parties where we have this control.
- **What is Corruption?**
- Corruption is the misuse of entrusted power for personal gain.
- **Your responsibilities**
- All staff, Board/Committee members, any additional workforce such as agency staff, and any other worker are required to comply with SettleParadigm's policies and procedures and apply best practice in order to prevent bribery. You should be aware of your own responsibilities in protecting SettleParadigm from bribery.
- You have a responsibility to comply with applicable laws and regulations relating to ethical business behaviour, procurement, personal expenses, conflicts of interest, confidentiality and the acceptance of gifts and hospitality. This means, in addition to maintaining the normal standards of personal honesty and integrity, you should always:
 - avoid acting in a way that might cause others to allege or suspect them of dishonesty
 - behave in a way that would not give cause for others to doubt that SettleParadigm deals fairly and impartially with official matters
 - be alert to the possibility that others might be attempting to deceive
- You have a duty to ensure that the business' money is safeguarded, whether or not you are involved with cash or payment systems, receipts or dealing with contractors or suppliers. If in doubt about a decision, you should ask yourself 2 questions:
 - What would residents expect [of my decision, action, conduct]?
 - How might residents perceive [my decision, action, conduct]?

- If you suspect that bribery has taken place you should ensure it is reported to the Finance Team.
- You must ensure that you read, understand and comply with this policy.
- If you breach this policy, you will face disciplinary action, which could result in dismissal.
- **Investigating Bribery & Corruption**
 - Any potential bribery or corruption allegation will be investigated in accordance with clear procedural guidance.
 - Concerns about irregularities should be raised immediately in the first instance with your line manager or otherwise in line with the Whistleblowing Policy.
 - Any case where bribery or corruption is suspected must be reported to the Finance Team.
 - Where the incident is reported in line with the Whistleblowing Policy, the investigation will be covered under the provisions of that policy.
 - Where any bribery or corruption has come to light by other means, primary responsibility for investigation of the matter which is believed may have been committed by an employee, or third party, lies with the Chief Financial Officer who will make an initial assessment of the incident, including whether to report the matter to the Police and other third parties. They may delegate the investigation to another member of the management team and/or an Assistant Director and/or the internal auditor.
 - If the allegation of bribery or corruption is made against the Chief Financial Officer, the Chief Executive will take responsibility for the investigation.
 - Responsibility for investigating bribery or corruption, which may involve a member of a committee or the Board, will rest with the Chief Executive.
 - Any corrupt act perpetrated or attempted by a Board member or Executive Officer, no matter how low in value, must be reported to the Group General Counsel (Company Secretary), to the Chair of the Audit & Risk Committee and the Chair of the Group Board immediately.
- **Training**
 - All staff must complete mandatory training on bribery and corruption during their first month at Paradigm.
 - All staff must complete a mandatory refresher course on bribery and corruption every two years.

5. Equality, Diversity & Inclusion

- The requirements of this policy apply to all Board and Committee members, employees and other workers equally, regardless of protected characteristics, and therefore will not result in differential treatment.

6. Roles and responsibilities

- Group General Counsel has overall accountability for the Policy.
- The Finance Team will maintain a register which contains details of any incidents of Bribery & Corruption (and Fraud); however, it is for individuals to provide details of any allegations or suspicions of bribery to the dedicated email.

Compliance/Key Performance Measures

- The number of incidents of bribery or corruption
- Completion by all Board/Committee, employees and workers of the mandatory training
- Regular requests to managers to confirm whether they are aware of any incidents
- Regular reports to the Audit & Risk Committee and Group Board.

7. Related Policies, Procedures and Key Documents

- Anti-Fraud Policy
- Code of Conduct
- Whistleblowing Policy

8. Version Control

Version control			
Date	Version	Approved By	Details of Amendments
03/11/2025	V1	Group Common Board	New integrated Policy for SettleParadigm