Anti-Bribery and Corruption Policy

March 2026

Owner: Governance Manager

Version	Purpose/Changes	Approval Date	Approved By	Suggested Review Date
3.0	**Health check**	**25/03/2026**	**Ongo Homes Board**	**2029/2030**
2.0	Health Check	28/03/2023	Group Common Board	March 2026
1.0	New Policy	29/03/2022	Group Common Board	March 2023

Contents:

		Page
1.	Our policy is…	2
2.	It applies to…	2
3.	Because we want to…	2
4.	We will…	2
5.	Guidance	3
6.	Making sure we're doing what we say…	3
7.	Other things to bear in mind…	4
8.	We'll review this…	4
9.	What we mean…	4
	APPENDIX 1	6

1. Our policy is…

1.1 To conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate; implementing and enforcing effective systems to counter bribery and corruption and upholding all laws relevant to countering bribery and corruption.

2. It applies to…

2.1 This policy applies to the whole of the Ongo Group including our commercial businesses, Ongo Heating and Plumbing (trading as Hales & Coultas Heating and Plumbing Ltd), Trent Valley Electrical Services Ltd and Ongo Roofing (trading as Ashbridge Roofing).

2.2 The policy applies to all colleagues, Board Members, contractors, external consultants, agency workers, seconded workers, volunteers, third-party representatives and business partners, sponsors, or any other person associated with the Ongo Group.

3. Because we want to…

3.1 The purpose of this policy is to:

- Set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on bribery and corruption
- Provide information and guidance to those working for and on our behalf on how to recognise and deal with bribery and corruption issues
- Establish transparent frameworks for identifying, assessing, and managing bribery ad corruption risks across our operations.

4. We will…

4.1 It is a criminal offence to offer, promise, give, request or accept a bribe. Individuals found guilty of committing a bribery offence can be punished by up to 10 years in prison and / or a fine.

4.2 As an employer, if we fail to prevent bribery, we can face an **unlimited fine**, exclusion from tendering for public contracts and damage to our reputation.

4.3 It is everyone's responsibility to prevent, detect and report instances of bribery or corruption and everyone must avoid any activity that might lead to or suggest a breach of this policy. Appendix 1 gives examples of possible risk areas to look out for. Reports of instances of bribery or corruption should be made in line with our Whistleblowing Policy or to your Manager.

4.4 **Facilitation payments and kickbacks**

4.4.1 A kickback is 'Typically payments made in return for a business favour or advantage'. A Facilitation Payment is 'Also known as "back-handers" or "grease payments". Typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official). They are not common in the UK'.

4.4.2 We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.

4.4.3 You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted.

4.4.4 If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Governance Manager.

4.5 **Gifts, hospitality and expenses**

4.5.1 The acceptance and offering of gifts and hospitality should be in line with our Probity Policy. Any gifts or hospitality received, or offered and declined, should be reported to the Governance Team. All gifts and hospitality will be recorded in a central register maintained by the Governance Team and reviewed quarterly to identify any patterns of concern or potential policy breaches.

4.5.2 Reimbursing a third party's expenses, or accepting an offer to reimburse our expenses would not usually amount to bribery (e.g. the costs of attending a business meeting). However, a payment in excess of genuine and reasonable business expenses is not acceptable (e.g. such as the cost of an extended hotel stay).

4.5.3 We appreciate that practice varies in the consideration of what is reasonable. The test to be applied is whether in all the circumstances the gift, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered and the values referenced in the Probity Policy followed

4.6 **Donations**

4.6.1 We do not make contributions to political parties.

4.6.2 We will support organisations by way of charitable donations or sponsorships in line with our Charitable Donations and Sponsorship Policy.

4.7 Anyone who refuses to accept or offer a bribe, or who raises a concern or reports another's wrongdoing can sometimes worry about possible repercussions. At Ongo, 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.

4.8 Nobody will suffer any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may do in the future. If you feel you have suffered detrimental treatment, you should inform your manager (or their manager if appropriate). If the matter is not remedied, you should raise it formally with People and Culture team under the Grievance Policy.

5. Guidance

5.1 If you are offered a bribe or are asked to make one, or if you believe or suspect that any bribery, corruption or any other breach of this policy has occurred or may occur, you must raise it with your manager (or their manager if appropriate) or report in line with our Whistleblowing Policy as soon as possible.

5.2 Whoever you make a report to is responsible for investigating the report.

5.3 They will need to inform the Company Secretary within two working days of receiving a report. This will allow the Company Secretary to keep a group wide record and have overview of ongoing investigations.

5.4 Investigations will be completed as soon as practicable, normally within 21 days depending on complexity and availability of evidence.

5.5 The outcome of the investigation will be discussed with the Company Secretary and a course of action needed to be taken will be agreed. This will depend on the nature and severity of the report's findings.

5.6 This may include reporting the issue to the Police, disciplinary for colleagues or a ban from being involved in Ongo business for contractors.

6. Making sure we do what we say...

6.1 The Board and Executive Directors have overall responsibility for ensuring this policy complies with our legal, regulatory and ethical obligations and that all those whom the policy applies to comply with it.

6.2 The Company Secretary is responsible for ensuring any required investigation is made and outcomes followed up. They also have responsibility for any breaches of this policy.

6.3 The Governance Manager is responsible for ensuring this policy is reviewed in line with the Policy Development Framework and any legislative or regulatory changes. Interim updates will be made in response to legal or regulatory changes.

6.4 The Audit & Risk team is responsible for auditing internal control systems and procedures to ensure they are effective in countering bribery and corruption.

6.5 All managers are responsible for ensuring their team members understand and comply with this policy and that any training required as part of their role is completed.

6.6 Appropriate training will be provided at the appropriate level to colleagues and Board members. Refresher training will be provided when required. Interim updates will be made in response to legal or regulatory changes.

6.7 Our zero-tolerance approach to bribery and corruption will be communicated to contractors, external consultants, agency workers, seconded workers, volunteers (not our tenant volunteers), , third-party representatives and business partners, sponsors, or any other person associated with the Ongo Group.

6.8 We keep financial records and have appropriate internal controls in place, which will evidence the business reason for making payments to third parties.

7. Other things to bear in mind…

7.1 Are our:

- Probity Policy
- Charitable Donations and Sponsorship Policy
- Employee Code of Conduct
- Contractors Code of Conduct
- Board Member Code of Conduct
- Volunteer Code of Conduct
- Fraud Management Framework and Guidance
- Anti-Money Laundering Policy & Guidance
- Procurement Policy
- Disciplinary Policy and Guidance

8. We'll look at this again…

8.1 Every three years or sooner should there be any change to legislation or regulation that needs to be considered.

9. What we mean…

Word	What it means
Bribery	Offering, promising, giving or accepting any financial or other advantage (e.g. money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value), to influence the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.
Conflict of Interest	A situation where an individual's personal interests (financial or otherwise) could influence, or appear to influence, their professional judgement or decisions on behalf of Ongo. Any perceived conflict of interest must be declared and managed.
Corruption	The abuse of entrusted power or position for private gain.
Due Diligence	Documented investigation and verification of a third party's ownership, financial integrity, ethical track record, regulatory status and alignment with this policy before engagement. Proportionate to the level of risk and value of the relationship.
Facilitation payments	Also known as "back-handers" or "grease payments". Typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official). They are not common in the UK.

Kickbacks	Typically payments made in return for a business favour or advantage.

APPENDIX 1

Potential risk scenarios: "red flags"

The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to your manager (or their manager if necessary) or in line with our Whistleblowing Policy:

(a) you become aware that an organisation or individual engage in, or has been accused of engaging in, improper business practices;

(b) you learn that an organisation or individual has a reputation for paying bribes, or requiring that bribes are paid to them;

(c) an organisation insists on receiving a commission or fee payment before committing to sign up to a contract with us;

(d) an organisation or individual requests payment in cash and/or refuses to sign a formal contract or fee agreement, or to provide an invoice or receipt for a payment made;

(e) a request for payment is made to a country or geographic location different from where the requester resides or conducts business;

(f) a request for an unexpected additional fee or commission to "facilitate" a service;

(g) a demand for lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;

(h) a request that a payment is made to "overlook" potential legal violations;

(i) a request that you provide employment or some other advantage to a friend or relative;

(j) you receive an invoice that appears to be non-standard or customised;

(k) insistence on the use of side letters or refusal to put terms agreed in writing and/or follow our Procurement and Tendering Procedures;

(l) you notice we have been invoiced for goods or services that appears large given the service stated to have been provided;

(m) a request or requirement for the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;

(n) you are offered an unusually generous gift or offered lavish hospitality