

BRIBERY ACT STATEMENT

gentoo

TOP LEVEL COMMITMENT – FRAUD, BRIBERY AND CORPORATE CRIMINAL OFFENCES (TAX FRAUD AND TAX EVASION)

As a socially responsible organisation operating within a regulated sector the Board of Gentoo Group requires that our business should be conducted in an open, honest and transparent manner. These attributes are also hallmarks of good corporate governance benefitting the organisation by protecting the Group's reputation and promoting customer and stakeholder confidence. The Regulator of Social Housing requires that all Registered Providers have 'probity arrangements' in place and effective governance arrangements to ensure compliance with all relevant law. This Policy is a component of the Group's probity and governance arrangements to comply with relevant law and supports compliance with the Group's Code of Conduct and Code of Governance.

Every employee and member has a role to play in maintaining the standards which the customers and other stakeholders are entitled to expect of the Group. The Group expects all Board and Committee Members, employees and involved residents of the Group to maintain the highest standards of probity and integrity. This includes compliance with all relevant regulations, codes of conduct, etc. Non-compliance will be regarded as a serious issue and may result consequences such disciplinary action, removal from a Board or Committee, removal from the Group's list of suppliers etc.

The Board recognises that fraud, bribery and tax evasion/fraud is a damaging practice that undermines reputation of the Group, those associated with it and the sector. This statement demonstrates our commitment to preventing incidents of this kind. The Board has a zero risk appetite to and tolerance of acts of fraud, bribery, corruption and tax evasion/fraud and will enforce effective systems to counter this activity. Appropriate action will be taken against persons associated with these activities such as disciplinary action, criminal proceedings, removal from supplier lists and removal from a Board or Committee.

We have created an Anti-Fraud, Bribery and Corruption Policy that sets out the Group's approach to prevent such incidents. This policy has been created with reference to the relevant legislation and associated guidance.

We require all contractors appointed by the Group to demonstrate a commitment to prevention of fraud, bribery and corruption.

As part of our commitment, a number of preventative procedures and sources of assurance have been established as follows;

- Anti-Fraud, Bribery and Corruption Policy
- Gifts and Hospitality policy and procedures
- Financial Regulations, Delegation Scheme and Standing Orders
- Anti Money Laundering Policy and Procedures
- Code of Conduct and 'probity' arrangements
- Conflicts of interest procedures

- Annual declaration of interests, gifts and hospitality (employees and Board Members)
- Executive Director annual self-assessment of compliance and review of gifts and hospitality
- Approvals processes and separation of duties
- 'probity report' to Risk and Audit Committee as part of the annual assessment of compliance
- Whistleblowing policy and procedures

Preventative procedures are developed with the involvement of the Group Executive Team and Risk and Audit Committee. The Executive Director of Corporate Services and Governance and Risk Team is responsible for overseeing the implementation of the Group's preventative procedures. If you have any concerns or queries in relation to this statement or our procedures in respect of bribery please contact the Head of Governance and Risk.