

Anti-Corruption and Bribery Policy

1. POLICY STATEMENT

It is the policy of the Hobden Group of Companies (listed in Footnote) (“the Group”) to conduct its business in an honest and ethical manner and in accordance with the principles set out in the Bribery Act 2010. Any reference to the Group refers to each company in the Group individually as well as collectively.

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.

Any employee who breaches this policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

This policy does not form part of any employee’s contract of employment and we may amend it at any time. It will be reviewed regularly.

The purpose of this policy is to:

- set out our responsibilities, and the responsibilities of those working for us, in observing and upholding our position on bribery and corruption;
- provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

2. WHO MUST COMPLY WITH THIS POLICY?

This policy applies to all persons working for the Group or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3. WHAT IS BRIBERY AND CORRUPTION?

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit. Bribery includes offering, promising, giving, accepting or seeking a bribe. Corruption is the abuse of entrusted power or position for private gain.

All forms of bribery and corruption are strictly prohibited. If you are unsure whether or not a particular act constitutes bribery or corruption, you should raise it with the Hobden Group company accountant or a director. Specifically, you must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- accept a payment, gift, hospitality or any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official (including NHS officials) to facilitate or speed up a routine or necessary procedure or to obtain an unfair advantage;
- Threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

4. **GIFTS AND HOSPITALITY**

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

However, a gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in the corporate name, not your name.

Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

5. **RECORD-KEEPING**

You must:

- declare and keep a written record of all hospitality or gifts given or received above a monetary value of £100.
- submit all expenses claims relating to hospitality, gifts or payments to third parties to the Hobden Group company accountant and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and clients should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

6. **HOW TO RAISE A CONCERN**

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify the Hobden Group company accountant as soon as possible. If internal disclosure proves inappropriate, concerns can be raised with the Hobden Group's external auditor.

We are committed to ensuring that no one suffers 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 take place in the future.

Footnote

Hobden Group of Companies

Carnegie Property Company Limited
Medical Centre Holdings Limited
Medical Centre Developments Limited
Medical Centre Developments (GB) Limited
Medical Centre Scotland 2000 Limited
Medical Centres Scotland Limited
Hobden Asset Management Limited
Hobden Cromwell Limited
Hobden Capital Limited
Hobden Estates (Bicester) Limited
Hobden Estates (Kingsmere) Limited
Hobden Estates (UK) Limited
Hobden Retail Limited
Northchapel Limited
Pre-School Properties Limited
Rural Housing Trust Limited