



# Anti-bribery and corruption policy

## 1.0 Introduction and purpose

### Policy statement

Crest Nicholson has a zero-tolerance policy toward all forms of bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. We have implemented and enforce effective systems to counter bribery and corruption.

We take our legal responsibilities very seriously. We uphold all laws relevant to countering bribery and corruption. We are bound by UK laws, including the Bribery Act 2010, in respect of our conduct.

### Policy purpose

This policy is designed to:

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

### What is bribery?

Bribery is offering, promising, giving or accepting any financial or other advantage, to induce 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.

It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine and employers that fail to prevent bribery can face an unlimited fine, exclusion from tendering for public contracts, and damage to its reputation.

### What is corruption?

Corruption is the abuse of entrusted power or position for private gain.

## 2.0 Scope

This policy applies to all employees of Crest Nicholson and to any associated person who performs services for, or on behalf of, the Group e.g. supply chain partners, such as individual contractors, agency staff, agents, consultants or representatives of the Company.

Anyone failing to comply with this policy, or any relevant law, may be subject to criminal and civil sanctions. Employees will be subject to disciplinary action being taken against them by the Group. applied consistently to fraud suspects regardless of position or length of tenure.

## 3.0 Responsibilities

**Bribery is prohibited at Crest Nicholson.**

**You must not give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.**

**You must not accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return. Excessive or unreasonable gifts, entertainment or expenses are prohibited.**

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

We have produced internal guidance for some specific business areas where the legitimacy of our practices and the way in which they are carried out must be considered carefully so that their proper purpose is correctly characterised and disclosed. This information is found in the Bribery Risk Areas Guidance.

### **Gifts, entertainment and expenses**

Acceptable practice permits the giving and receiving of gifts and entertainment where they are transparent, proportionate, reasonable and genuine. You should refer to the Gifts and Entertainment Policy and Procedure which sets out the threshold levels for seeking any requisite approvals (including pre-approval in certain circumstances) and provides a framework for the recording of such items. You will not be reimbursed for expenses you incur that are subsequently deemed or found to be a bribe.

### **Conflicts of interest**

You are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Group. You should refer to the Conflicts of Interest Policy and Procedure for further information on how to identify conflicts and how to request approval.

### **Facilitation payments and kickbacks**

Facilitation payments, also known as 'back-handers' or 'grease payments', are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example, by a government official). Kickbacks are typically payments made in return for a business favour or advantage.

**You must not make or accept any facilitation payments or kickbacks on behalf of Crest Nicholson.**

If you have doubts about whether a payment should be made and suspect that it might be considered a facilitation payment, you should seek further advice immediately from your line manager or point of contact, who will liaise with the Group Company Secretary to agree the course of action. You should only ever make a payment if the official or third party can provide a formal receipt or written confirmation that supports the assessment of its legality and obtain senior management/legal approval for the payment. Under no circumstances should you accept any form of facilitation payment or kickback.

### **Payments to Public Officials**

You must not make any improper payment to a Public Official where the objective is to influence the Public Official on matters affecting us or to obtain or retain business, or a business advantage.

The term Public Official is applied broadly, and includes any person, whether elected or appointed, in any branch of foreign, national or local government in any jurisdiction. It includes officials holding a legislative, administrative or judicial position of any kind and any political party official, or any candidate for public office. The term also covers a person who exercises a public function for any public enterprise or public agency. As such, Public Officials could include members of the police or fire

services. It also covers certain individuals who work for businesses that are owned or partly owned by governments.

Although the Bribery Act is considered to place a greater burden on bribery that concerns 'foreign' Public Officials, the Group's policy treats all Public Officials, whether foreign or domestic, in the same way as if a greater duty exists generally.

### **Political contributions**

We do not and must not make direct or indirect contributions to political parties. You must not offer, promise or give any political contributions.

### **Charitable donations**

Charitable donations or other sponsorship must not be used as an alternative form of bribery. However, there will be situations where it is ordinary and proper to make charitable donations to organisations associated with, or supported by, business partners within the ordinary course of trading relationships.

All circumstances around which a donation is made, where the amount falls within the agreed charitable spend budget for the relevant division, must be considered and approved by the relevant divisional Director. Where donations exceed the annual budget in any financial year, additional donations must be considered and approved by the relevant divisional Managing Director. Donations at Group level must be approved by the relevant Executive Committee member.

### **Training**

Training on this policy forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

### **Seeking advice**

If you are in any doubt as to whether a fraud has occurred, discuss the situation with your line manager, HR business partner or the Group Company Secretary.

### **Raising concerns**

**If you know of or are involved in an act of bribery or if you suspect that that another person working for the Group (in any capacity) has offered or accepted a bribe, you have a duty to report your suspicions, knowledge or involvement.** You should report this to your line manager at the first available instance or to a more senior manager within Crest Nicholson. If you feel unable to raise an issue at any level, you may contact our anonymous, confidential and free telephone service 24/7 on 0800 068 9449 or via [www.crestnicholson.ethicspoint.com](http://www.crestnicholson.ethicspoint.com). This service is run by an independent organisation.

### **Repercussions**

Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring 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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Group Company Secretary immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## **4.0 References**

Gifts and Entertainment Policy and Procedure  
Conflicts of Interest Policy and Procedure  
Bribery Risk Areas Guidance  
Speaking up Policy