

Bribery and corruption

Our principle

We refuse to offer, give or receive bribes or improper payment or participate in any kind of corrupt activity, either directly or through a third party.

What we mean

- We will not offer or receive bribes in any circumstance, for example, to secure new business, extend lease terms or increase our monetary income. We will not allow others working on our behalf to do this either.

We will always

- Be clear and transparent in any offer to GPs or other tenants to carry out works in exchange for a longer lease term or higher rent.
- Include the NHS and District Valuer in any offer made and ensure that any payments are appropriate, correct and fair consideration.
- Ensure that any premium, rent free period, lease extension or lease terms are clearly documented.

We will never

- Participate in any form of corrupt behaviour.
- Act without consultation of the Executive Board.

Taking our responsibilities seriously

All employees are accountable for their actions and are required to conduct business with integrity. If in doubt regarding appropriate behaviour or a particular course of action, you should seek guidance from others in the organisation including managers. Each of us is expected to be familiar with and follow the policies, laws and regulations that apply to our jobs; conduct our business according to the highest ethical and legal standards; and, if we ever become concerned that Assura or our colleagues are falling short of these standards, to voice our concerns. This policy represents guiding principles only - it cannot anticipate all circumstances and situations that employees may encounter. The exercise of good judgement is still expected from employees at all times. The policy does not alter the terms and conditions of your employment, rather it assists each of us in knowing what is expected of us and where to go for advice or help if necessary.

Avoiding bribery and corruption risk

Assura is committed to ensuring adherence to legal and ethical standards in every aspect of the way in which we operate our business. This is not just a cultural commitment on the part of the organisation; it is a legal requirement. Bribery is a criminal offence, and corrupt acts expose us and our employees to the risk of prosecution, fines and imprisonment, as well as endangering Assura's reputation. It is Assura's policy to conduct business in an honest way, without the use of corrupt practices or acts of bribery to obtain an unfair advantage. Bribery in simple terms is the offer or receipt of an advantage where the offer, request or receipt of such advantage breaches duties which an employee or third party owes to his employer or principal e.g. the duty to act in good faith, impartially or not to act in breach of trust. Any form of benefit whether financial or not can be considered to be a bribe, if given with the requisite intention.

Avoiding fraudulent practices – procurement

Bribery in procurement decisions is any advantage which constitutes the provision of an improper advantage. For example, any advantage which improperly influences a decision maker in order to award a contract to Assura could be considered a bribe. Careful consideration needs to be given as to whether any advantage offered could be considered a bribe. Advantages which could be considered as a bribe are benefits provided personally to a decision maker or a class of decision makers which lead them to breach duties for example of good faith etc. to a third party. Fraudulent practices are strictly prohibited, this includes practices that impair or harm (or threaten to impair or harm), directly or indirectly, procurement or selection or contract execution with the aim of improperly influencing decision makers' actions. Such practices involve any acts or omissions, including misrepresentations that mislead, whether recklessly or intentionally, any person, involved in the procurement, selection or contract execution process.

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