

Counter-Fraud, Bribery and Corruption Statement November 2022

The UK Bribery Act 2010 came into force on 1 July 2011, the aim of which is to tackle bribery and corruption in both the private and public sectors.

The Act defines the following key offences with regard to bribery:

1. Active bribery (offering, promising or giving a bribe);
2. Passive bribery (requesting, agreeing to receive or accepting a bribe); and
3. Bribery of a foreign public official.

The Act also sets out a corporate offence of failing to prevent bribery by an organisation not having adequate preventative procedures in place. One of the six principles of the Act requires that there is top-level commitment in the organisation for preventing bribery. Turning Point and Turning Point (Services) Limited (the “Group”) is committed to ensuring compliance with the Act and has a zero tolerance approach to fraud, bribery and corruption.

The Group follows best practice and has robust controls, policies and procedures in place to prevent fraud, bribery and corruption. To limit our exposure to bribery we have in place a Counter-Fraud, Bribery and Corruption Policy, which includes our policy on Gifts and Hospitality. This policy requires that employees declare and request permission to accept or give gifts or hospitality over a certain threshold. Gifts and hospitality registers are maintained and reviewed locally.

The success of our anti-bribery approach depends on our people, the people we support and those acting on behalf of the Group playing their part in helping to detect and eradicate such offences.

Thank you as always for your commitment to act with the highest standards of integrity and ethical behaviour in all your everyday dealings.

Julie Bass
Chief Executive