

Aster Group is the overarching brand name of Aster Group Ltd and all its subsidiaries

1 Scope

- 1.1 This policy, its associated principles and related procedures sets the expectations of honest behaviour when working for or with the Aster Group, referred to as Aster within this policy. It provides the framework within which Aster has a zero-tolerance approach and will respond to suspicions of conduct or actions that conflict with the expected standards, policies or interests of Aster or the wider public interest.
- 1.2 This policy contains the overarching statements and expectations relating to the principles of Aster's adopted National Housing Federation (NHF) Code of Conduct (2022 version) and includes principles relating to:
 - Loyalty and conflicts of interest
 - Remuneration
 - Gifts and hospitality
 - Personal Benefit
 - Anti-Fraud and Anti-Bribery
 - Speak Up (Whistleblowing)
 - Unacceptable behaviour.
- 1.3 There are other policies, procedures and guidance linked to this policy which are listed in section 4.
- 1.4 This policy applies to all Aster colleagues, Board and Committee Members, consultants, partners, contractors, volunteers, and those with a business relationship with Aster .
- 1.5 Board and Committee Members are collectively referred to in this policy as 'Members'. This includes Members of the Aster Group Limited Board and all Subsidiary Boards plus committees of both. It also includes co-optees and trustees.
- 1.6 Speak Up concerns may be raised by those listed in 1.4 or by customers, regulators, commissioners, or members of the public. It is the responsibility of everyone associated with Aster to voice any concerns.
- 1.7 Aster's approach to investigation and the procedure followed will be determined by the nature of the concern raised, as set out in the associated principles.
- 1.8 This policy differs from the grievance procedure whereby colleagues of Aster may already raise complaints or matters of genuine concern of a personal nature, for example complaints relating to a management decision or their terms and conditions of employment.
- 1.9 This policy is also different from the complaints process that relates to a customer's experience of service delivery.

2.1 Overarching Policy statement

- 2.1.1 The Aster Way sets out our values and behaviours, and Aster takes a proactive approach to maintaining the highest standards of honesty, openness, probity and accountability. This is in line with Aster's adoption of the NHF Code of Conduct (2022 version).
- 2.1.2 We recognise that like all organisations, Aster faces the risk of things going wrong or that there are unknown instances of wrongdoing. We want to identify such situations and take actions to remedy them. If malpractice is identified early, we have the greatest opportunity to safeguard colleagues, customers and the wider public, as well as protect Aster.
- 2.1.3 In addition to the expected standards of personal honesty and integrity, all Aster people have a responsibility to comply with all applicable laws and regulation and Aster's policies and to demonstrate ethical business behaviour.
- 2.1.4 To safeguard against adverse financial and business risk, Aster sets best practice policies and procedures including those relating to procurement, claiming expenses, all types of financial transactions, declaring conflicts of interest, maintaining confidentiality and the giving, and receiving, of gifts and hospitality. Colleagues must always:
- follow relevant policies and procedures,
 - avoid acting in any way that might cause others to allege, or suspect them of, dishonesty,
 - behave in a way that would not give cause for others to doubt that Aster employees deal fairly and impartially with official matters, and
 - be alert to the possibility that others might be attempting to deceive.
- 2.1.5 The Governance & Risk Director (in the absence of or when delegated; the Head of Risk & Compliance) has responsibility to:
- receive, acknowledge and record any concerns raised under this policy,
 - determine the appropriate process under which the concern should be managed,
 - ensure there is prompt investigation,
 - report to the appropriate Executive Board Director where the investigation identifies a serious cause for concern within the responsibilities of that Director and to recommend the use of any relevant statutory powers or duties,
 - where the report relates to the conduct of a member or one of the Executive Board directors, they will report to the Group Chief Executive Officer,

- where the report relates to the Group Chief Executive Officer, they will report to the Senior Independent Director or the Group Chair,
- where the report relates to the Group Chair, they will report to the Senior Independent Director,
- report either jointly with the Executive Board Director concerned or in their own right, as directed under the scheme of delegation,
- recommend, in conjunction with the Group Chief Executive Officer to settle appropriate action to resolve a report, and
- provide an annual report on the number and nature of concerns raised under this policy.

2.1.6 Where an investigation determines an act has occurred in conflict with this policy, it could lead to a serious disciplinary, contractual and/or criminal prosecution consequences for the individual(s) concerned.

2.2 Code of Conduct

2.2.1 The NHF Code of Conduct (2022 version) applies to all parts of Aster. It requires Aster colleagues, members and involved customers to:

- act in the best interests of the Aster and its customers in line with its social purpose,
- behave with integrity and protect the reputation and good name of Aster. This depends in part on compliance with this Code, and with the laws, policies and procedures that it refers to. The integrity of those involved needs to be transparent and beyond doubt.
- conduct themselves professionally and treat others well. This includes demonstrating professionalism, consideration and respect for others, and a commitment to the principles of equality, diversity and inclusion, which are fundamental to the delivery of social purpose, and
- protect themselves, others and the environment. Everyone has a responsibility whilst representing or working for Aster to protect their own health, safety, security, and wellbeing and that of others, and, where reasonable, to make the most positive possible environmental impact.

2.2.2 The Aster Group Limited Board is ultimately responsible for the actions, policies and work of the Group. It is their responsibility to make sure that all those concerned can comply with the Code of Conduct.

2.2.3 There is an additional Board and Committee Member Code of Conduct. This ensures that personal interests do not influence decisions and that members do not seek personal gain from their work at the Group. The Member Code also strengthens the approach to dealing with entity conflicts in extreme situations.

2.2.4 For colleagues working in care, there is a Code of Conduct for Adult Social Care Workers in England that we abide by.

2.3 Loyalty and conflicts of Interest

- 2.3.1 Colleagues, members and involved customers must act and be seen to act in the best interests of Aster, its customers and other service users. All actual, or potential, conflicts or dualities of interest must be openly declared and properly resolved. Conflicts of interest occur when an individual's personal interests, e.g. family, friendships, financial or social factors, etc., could compromise or appear to compromise their judgement, decision-making or actions in the workplace.
- 2.3.2 Aster colleagues, members and involved customers are required to make an annual declaration of interest. This is mandatory and must be completed, even if declaring the absence of any relevant interests, and updated on an ongoing basis if situations change. It is the responsibility of the individual to ensure that their interests are fully, properly, and promptly declared.

2.4 Remuneration

- 2.4.1 All decisions on remuneration must be lawful, transparent, fair and proportionate.
- 2.4.2 Aster has clear and transparent policies for member, colleagues, and executive remuneration, determining remuneration levels and for authorising any non-contractual payments to colleagues.
- 2.4.3 Unless decided otherwise by the Aster Group Limited Board, Aster does not remunerate involved customers who sit on the Customer Scrutiny Panel, Designated Complaints Panel or other panels as formed, apart from covering reasonable expenses. The only exception is Aster customers who are members of the Customer Voice Committee, who do receive remuneration.
- 2.4.4 Where applicable, the total remuneration of members will be declared annually in the audited accounts.
- 2.4.5 Payment to customers to incentivise or reward participation or other behaviour or activity will only be undertaken after consideration of all relevant factors such as how payment would help us achieve our objectives, the views of customers and other stakeholders and any published guidance or sector norms. Any payment must be approved in accordance with our scheme of delegation (this includes the use of prizes as incentives for customer engagement).

2.5 Gifts and Hospitality

- 2.5.1 Aster has a principles-based approach to guiding employees and members on whether they can give or receive offers of gifts, hospitality or other benefits from individuals or organisations. Individuals must recognise their role in protecting Aster's reputation and in doing so ensure they comply with principles and procedures outlined in this policy. This in turn protects individuals' personal reputations and protection from any suggestion of wrongdoing.
- 2.5.2 Aster leaders must ensure their operations are conducted in accordance with this policy and ensure that they consider offers and acceptance of gifts or hospitality in a timely manner, and ensure they are recorded, using the arrangements detailed below.
- 2.5.3 In no circumstances will Aster or its representatives offer, accept, or give incentives, in cash or in kind, to gain commercial or other advantage.

2.6 Personal benefit

- 2.6.1 Aster must demonstrate that colleagues, members and involved customers and those closely connected to them, receive no preferential treatment through benefits such as housing accommodation or employment.
- 2.6.2 Aster has fair and transparent procedures for the provision of housing accommodation for colleagues, members and involved customers, and those closely connected with them.
- 2.6.3 Aster also has fair and transparent procedures relating to the offers of employment to existing colleagues, members and involved customers, and to those closely connected with them.

2.7 Anti-Fraud

- 2.7.1 Fraud is any intentional act or omission designed to deceive others and made for personal gain or resulting in the victim suffering a loss. This could include false representation, failing to disclose information or by abuse of position.
- 2.7.2 Fraud is divided into three categories as follows:
 - Internal fraud perpetrated by colleagues within Aster, most often with access to moveable assets such as cash.
 - External fraud perpetrated by people outside Aster. It includes theft, deception and computer hacking.
 - Collusion that involves two or more parties who may be within the Aster, internal/external parties or external parties working together to commit fraud.
- 2.7.3 Aster will maintain internal audit arrangements to support the detection of fraud and dishonest behaviour, through testing the appropriateness, adequacy, effectiveness and robustness of relevant policies and systems.
- 2.7.4 In line with the Criminal Finances Act, we will review a minimum of annually, a risk assessment to ensure we have reasonable processes to prevent the facilitation of tax evasion.

2.8 Anti-Bribery

- 2.8.1 Bribery is offering, promising, influencing, giving, requesting, agreeing or receiving a financial or other advantage in connection with the improper use of a position of trust, or of a function that is expected to be performed impartially or in good faith.
- 2.8.2 In addition to this policy, the Procurement and Contract Standing Orders Policy and Framework provides additional protection to protect the organisation from acts of bribery and ensure compliance with the Bribery Act 2010.
- 2.8.3 Under the Bribery Act 2010, it is an offence to:
 - offer, promise or give a financial or other advantage to another person, i.e. bribe a person, whether within the United Kingdom (UK) or abroad, with the intention of inducing or rewarding improper conduct,
 - request, agree to receive or accept a financial or other advantage i.e. receive a bribe for, or in relation to, improper conduct, or

- bribe a foreign public official.

2.8.4 It is an offence in the UK for an employee or an associated person to bribe another person while conducting business, with the intention to either obtain or retain business or obtain or retain an advantage in the conduct of business. In such instances, Aster would be liable for this offence where it has failed to prevent such bribery. As well as an unlimited fine, there could be substantial reputational damage.

2.9 Speak Up (Whistleblowing)

- 2.9.1 We will aim to always provide an environment where colleagues can raise concerns openly using Restorative Practice (RP) principles, where appropriate. When a colleague has a concern about wrongdoing, their leader is usually their first point of contact. We recognise that occasions will arise where a colleague feels unable to do this.
- 2.9.2 Complaints or matters of genuine concern of a personal nature, for example complaints relating to a management decision or disagreement with terms and conditions of employment should be raised through the grievance procedure.
- 2.9.3 Our speak up arrangements do not apply to matters of individual conscience where there is no suggestion of wrongdoing by Aster, but for example, you are required to act in a way which conflicts with your personal beliefs. Should this situation arise, you should discuss it with your leader.
- 2.9.4 For when a colleague has a concern to raise in the public interest, we will provide a range of methods and channels for individuals to share their concern, with the assurance that it will be listened to and independently investigated.
- 2.9.5 To raise a concern, it is not necessary for someone to prove the matter they are alleging; but there must be reasonable grounds and they must be making the report genuinely and without vexatious intent. Following investigation, any matter proven to be vexatious could lead to action in line with the disciplinary procedure.
- 2.9.6 Anyone following the correct procedures to raise a concern in the reasonable belief that it is in the public interest, will not be treated less favourably.
- 2.9.7 We will treat all information received with sensitivity, disclosing only to those with a relevant role in the investigation or resulting processes. Dependant on the nature of the allegation, it will not always be possible for someone to remain anonymous during the investigation process. We will liaise with the individual about disclosing their identity including to whom it will be disclosed.
- 2.9.8 Anonymised reporting will be made to governing bodies and those with senior management responsibilities within Aster.
- 2.9.9 There will be circumstances where information must be disclosed for legal or legitimate interest reasons, e.g. the police, safeguarding, external investigators, external auditors, etc.
- 2.9.10 To enable these responsibilities, there is a right of access to all documents and records of the Group to individuals as described in 2.1.5

2.10 Unacceptable behaviour

2.10.1 If colleagues and/or members witness or experience inappropriate or unacceptable behaviour and are unsure of the appropriate route to report the incident, they may utilise the Speak Up process to confidentially seek guidance and advice. If a speak up investigation is not the appropriate approach, they will be guided to the appropriate process and any associated policy or procedures. Examples might be that a safeguarding incident report should be raised, or a case should be opened with our employee relations team.

3 Monitoring and Review

- 3.1 Reports received under this policy will be analysed alongside wider insight sources such as health and safety incidents, employee relations casework, safeguarding concerns and colleague voice, so potential trends or patterns can be identified.
- 3.2 The number, nature and anonymised origin of reports will be monitored by the Group Risk & Assurance Committee.
- 3.3 Awareness of this policy and the confidence of colleagues to raise concerns will be monitored by the Head of Risk & Compliance, in collaboration with the Head of Employee Engagement and Culture.
- 3.4 The effectiveness of this policy will be continuously monitored, and the embedding of the policy scrutinised after 12 months by the Operational Scrutiny & Assurance panel
- 3.5 This policy will be reviewed every three years unless business need, regulation or legislation prompts an early review.

4 Related Policies and Procedures

- 4.1 The policy relates to the:
 - NHF Code of Conduct (2022 version)
 - Corporate Code of Governance
 - Code of Conduct for Adult Social Care Workers in England
- 4.2 The policy is supported by the following procedures:
 - Probity Procedure and supporting guidance
 - Speak Up Procedure
 - Gifts and Hospitality Procedure and supporting guidance
 - Fraud & Bribery Response Plan
- 4.3 The policy relates to the following Aster policies and procedures:
 - Board and Committee Member Code of Conduct
 - Anti-Money Laundering Policy and Procedure
 - Health and Safety Policy
 - Financial Control Policy
 - Environmental Sustainability Policy

- Procurement & Contract Standing Orders Policy and Procedure
- Expenses procedure
- Data Protection, Privacy and Confidentiality Policy
- IT Security and Usage Policy
- Resolution Policy including Behaviour principles
- Diversity and Inclusion Policy including Dignity at Work principles and Dignity at Work Procedure.
- Regulatory Notification Policy & Arrangements
- Social Media Guidance
- Safeguarding Policies
- Anti-Modern Slavery & Human Trafficking Policy.

5 Governance			
Effective From:	30/10/2024	Expires:	29/10/2027
Policy Owner:	Chief Strategy Officer		
Policy Author:	Head of Risk & Compliance		
Approved by:	<i>Group Risk & Assurance Committee</i>		
Delegation Matrix Reference:	R016	Version Number:	V1.0

Aster Group is our overarching company brand and comprises the following companies and charitable entities. Aster Group Limited, Aster Communities, Aster Treasury plc, Synergy Housing Limited, East Boro Housing Trust Limited, Central and Cecil Housing Trust, Enham Trust, 55 London, Aster Foundation, Aster Living, Aster 3 Limited, Aster Homes Limited, Aster LD Limited, Aster Property Limited, Aster Solar Limited, Silbury Housing Holdings Limited, Silbury Housing Limited, Central & Cecil Innovations Limited, and Central & Cecil Construction Services Limited.

Loyalty and Conflicts of Interest Principles

- Aster will maintain a central Register of interests.
- All colleagues, agency workers, members and involved customers must declare interests through the designated process.
- Declarations will be entered in a Register of Interests and the leader (typically line manager) of the person making the declaration (or the leader acting on their behalf) will be advised automatically as soon as it is recorded on [REDACTED]. Leaders will consider and take any necessary action in line with the procedure.
- Colleagues employed by the Comensura agency acting on our behalf must complete our declaration of interest form which will be provided by the agency and recorded in its [REDACTED] system.
- Involved customers must complete our declaration of interest form which will be provided to them.
- If any action is required to reduce or remove a conflict, advice will be given by the Governance Team.
- Some examples (not an exhaustive list) of personal interests include:
 - you or someone in your family are a customer
 - a relative is employed by a company that provides goods or services to Aster
 - your grandparent owns significant land or property in our area of operation
 - your best friend is a member of a campaigning, customer or community association which has interests in the business
 - your father is a local councillor
 - your aunt is a Board member of another housing provider that also operates in our area i.e. a potential competitor
 - you are a member of a secret society
 - you sit on another Board within the Group
 - you are related to, or have a close friend who is, an owner or senior manager of a company doing business with Aster
 - you influence the issue of work to contractors and you, or a close friend or relative, has personally received services from that company
- Members who are nominees of a local authority should make a general declaration and, if there is a more direct interest, such as a planning matter in their ward, then this must also be declared. They must also ensure that the appropriate declarations are made to and recorded by their local authority.
- Any other circumstances where there could be a conflict between the interests of the local authority and Aster must also be declared.
- Anyone attending a meeting who has an interest must declare this at the beginning of the meeting or at the appropriate point on the agenda or as soon as the interest becomes

apparent. Specific guidance relating to declarations by members at Board or committee meetings is available from the Governance team.

Gifts and Hospitality Principles

- When deciding whether to accept or provide gifts, hospitality or other benefits, employees and members are expected to apply three principles:
 - **Purpose** – acceptance or provision should be in the interests of departments' strategic plans and should further Aster's objectives.
 - **Proportionality** – gifts or hospitality should not be over-frequent or over-generous. Accepting or providing gifts or hospitality too frequently from the same person or organisation may lead to an impression that the person or organisation is gaining influence. Similarly, gifts or hospitality should not seem lavish or disproportionate to the nature of the relationship with the partner, supplier, or customer.
 - **Avoidance of conflict of interest** – employees and members should consider the individual or supplier's relationship with the Group, e.g. whether Aster or the supplier is bidding for work, or the customer is applying for housing or purchasing a home, etc.
- Gift, hospitality or other benefit that you offer, give, receive or decline must be:
 - recorded on the Register on [REDACTED]; local registers must not be maintained,
 - clearly linked to a legitimate business reason and not in exchange for obtaining an inappropriate advantage or benefit,
 - connected to the work of Aster (when giving a gift or hospitality),
 - given in an open manner and not creating an expectation that you or Aster will give or receive something in return,
 - be in good faith and reasonable in value and frequency,
 - appropriate with consideration given to equality, diversity and inclusion, e.g. dietary requirements in relation to religion/health, gift/hospitality in relation to disabilities, etc., and
 - expensed in accordance with the appropriate business expense policies and procedures (when giving a gift or providing hospitality).
- Any gift, hospitality, or other benefit that you offer, give, receive or decline must NOT be:
 - seen to influence or appear to influence the independence of the giver or receiver of the gift or hospitality,
 - cash or vouchers,
 - offensive or inappropriate.
- Cash equivalent credits provided through employee benefit platforms are permitted if in line with all principles within this policy.
- Gift or hospitality you offer, give, receive or decline must be recorded and made in accordance with the above principles and where necessary approved in writing by your

leader or director using Aster's Register on [REDACTED] This should be done in advance.

- The only exception to the requirement to record in the Register is when the item is of nominal value such as stationery or a consumable item.
- Gifts estimated to be over £30 in value should only be accepted if to refuse would cause offence and it is encouraged that the gift be donated, shared with colleagues if perishable, or used for charitable purposes such as a prize in a raffle.
- Gifts under £30 in value may be kept apart from gifts offered by service providers as below.
- Gifts offered to you by a service user are not allowed and must not be accepted. The only exception to this rule are small tokens of appreciation gifted by service users or their families. Typically, this would be chocolates or a small item that is shared by the team. Service user means someone who uses the services of the Aster, such as a resident in a care home.
- Any invitation to attend an award ceremony received from a supplier or contractor, especially when a contract is due for renewal must be declined and a declaration made.
- An invitation to sporting or cultural events can be accepted if there is a genuine business need, e.g. networking, etc. otherwise this would be perceived as a gift.
- Hospitality offered or received must be reasonable and limited, and recorded on the Register. Specific thresholds are in place for the maximum spend per event and per individual, as detailed in the procedure. Any hospitality more than these thresholds must be agreed in advance with the Executive Board.
- The only exception to the requirement to record in the Register is when modest hospitality is received or provided in the course of normal business e.g. meeting refreshments or working lunches. On these occasions, the principles of purpose, proportionality and avoidance of conflicts of interest equally apply.
- Aster will always support your decision to refuse an offer of inappropriate gifts or hospitality, even if this could affect a business relationship. Gifts and hospitality that have been refused should also be recorded in the Register on [REDACTED].
- Donations can be sought for projects that will benefit Aster residents and for charity events. Donations cannot be sought during a tendering process. Donations to individuals cannot be accepted.
- Colleagues and Non-Executive Directors are not permitted to be involved in decision making, personally accept legacies or be an executor/power of attorney for residents, clients or service users, unless the recipient is related to the resident.
- Corporate sponsorship is not normally appropriate and will only be permitted if strictly aligned with Aster's charitable objects.
- Colleagues and Non-Executive Directors can seek individual sponsorship from colleagues for their fundraising. Aster funds will not be used unless match funding is permitted.

Personal Benefit Principles

- From time-to-time, Aster makes provision for benefits to be given to all colleagues and these are approved in accordance with the scheme of delegation.
- Entitlement to benefits, such as travel and subsistence allowances for colleagues, Non-Executives and involved customers are included in contracts of employment or agreements for services and other supporting documents.
- However, cases can arise which are not covered by the above and advice should be sought from the relevant Director, leader or the Governance and Risk Director.
- Sometimes Aster will want to recognise achievement or a special occasion by giving a gift or hospitality which might involve costs and/or the use of premises or colleague time. This covers items such as leaving parties, recognition of exceptional service, colleague or Board conferences or seasonal parties. These are approved in accordance with the scheme of delegation.
- **Offers of accommodation**
 - Aster can offer housing to colleagues, members and involved customers and those closely connected to them. Aster must demonstrate that they have been treated in the same way as any other applicant.
 - Applicants are required to declare any connections as part of the application process and no person having any direct knowledge of the applicant should play any part in the assessment or decision.
 - Authority to approve any allocation has been delegated to any two Regional Operations Directors.
 - Any allocation made to an Executive Board member or their close connections will be approved by the Aster Group Limited Board.
- **Offer of employment**
 - Aster will consider job applications from those who are, or who have a close connection with, a colleague, member or involved customer with the following conditions:
 - the connection must be disclosed at the time of application;
 - the application must be considered in the same way as all others and solely on the merit and suitability of the applicant in relation to the requirements of the position; and
 - anybody with personal knowledge of the applicant must be excluded from the assessment and decision-making process.
 - If an applicant is connected to a member, executive board member or senior leadership team member, an application would be acceptable if they have complied with the points above and fully meet the requirements of the post (following a fair,

open and transparent interview process). An offer of employment can be made with suitable safeguards are put in place to avoid any future conflicts of interest.

- When an employment offer is made to an individual, there must be no future direct line management with the closely connected party. Ideally there should be no line of management between the parties, but if this isn't possible then stringent arrangements must be put in place to safeguard Aster against any actual or perceived conflicts of interest.
- Close relationships i.e when individuals become partners, that develop during the course of employment must be declared by both parties on an ongoing basis and arrangements put in place, including to address any line of management issues, to avoid and actual or potential conflicts of interest.
- If an applicant is a member, they should immediately declare their interest and resign from their position as a member with immediate effect and there should be no presumption that they would be reappointed to their position if they were unsuccessful in their employment application.
- Authority to approve the offer of employment has been delegated as follows:
 - Appointment of the Group CEO and any Executive Board member - to the Board of Aster; and
 - Appointment to any other position – to any one Senior Leadership Team Director.

Anti- Fraud Principles

- All reports received of actual or suspected fraud will be recorded and investigated.
- Such investigations would usually be conducted by the Director of Audit, or an internal or external party appointed and overseen by the Director of Audit.
- Reported fraud cases and investigation outcomes will be monitored across Aster and lessons learned used to improve controls and prevent future fraudulent attempts.
- Aster will make an accurate and timely annual report to the Regulator of Social Housing on any losses that arise from fraudulent activity.
- A serious case of fraud would be notified to the Regulator of Social Housing immediately.
- External advice and guidance on individual cases or allegations will be sought where appropriate.

Anti- Bribery Principles

- Aster demonstrates it has adequate policies and procedures in place to prevent bribery in line with the following six principles:
 - **Proportionality** – action taken to prevent bribery is proportionate to the risks faced and the size and complexity of the Aster.
 - **Top level commitment** – the Aster Group Limited Board and Executive Board are committed to preventing bribery at Aster. They foster a culture in which bribery is unacceptable, which is supported through communication and training.
 - **Risk assessment** – Aster understands and keeps up-to-date with bribery risks through risk identification, assessment and monitoring.
 - **Due diligence** – Aster takes steps to understand those who perform services on its behalf to mitigate bribery risks, e.g. through our procurement policies and procedures, etc.
 - **Communication** – Aster communicates policies and procedures on Asternet, and provides appropriate training for colleagues.
 - **Monitoring and review** – the risks Aster faces, and the effectiveness of its procedures may change over time, so it is important that these are regularly evaluated by risk owners to monitor any changes in potential risks.

Speak Up (Whistleblowing) Principles

- These principles apply when the concern raised is a ‘qualifying disclosure’ under the Public Interest Disclosures Act.
- This means reporting wrongdoing where the interests of others or of Aster itself are at risk.
- To be a qualifying disclosure, there must be a reasonable belief that within Aster, one of the following has happened, is happening now or will happen in the future:
 - a criminal offence
 - the law is being broken
 - a miscarriage of justice
 - financial impropriety
 - endangering of someone’s health and safety
 - risk to the environment
 - abuse of company property
 - concealing one of the above

An employee raising a qualifying disclosure has statutory protection. This means they should not be treated unfairly or lose their employment as a consequence. Information can be found on the government website [Whistleblowing for employees: What is a whistleblower - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/whistleblowing-for-employees-what-is-a-whistleblower)

- Anyone not satisfied with the way in which the concern has been handled should speak to the Governance & Risk Director in the first instance. If an individual does not feel comfortable using any of the other channels, they can directly contact the Senior Independent Director, by emailing [REDACTED] or they can contact:
 - The charity PROTECT which provides free confidential advice to workers who have concerns about wrongdoing in the workplace.
 - ACAS (Advisory, Conciliation and Arbitration Service) helpline.
 - The Regulator of Social Housing (Whistleblowing for social housing staff).

Unacceptable behaviour Principles

- We are committed to providing a work environment where everyone is treated with dignity and respect. We will not tolerate discrimination, bullying, victimisation, harassment and sexual harassment. If Colleagues and Members witness or experience behaviour that isn't in line with The Aster Way and doesn't demonstrate respect for each other, the Dignity at Work procedure should be followed.
- Other examples of unacceptable behaviour might include; *this is not an exhaustive list*.
 - intentional disregard of policy or procedure
 - belittling language towards or rough treatment of a service user
 - falsification of records
- If Colleagues and Members witness behaviour that they perceive to be unacceptable but are unsure of the appropriate route to report the incident, they may use the available Speak Up processes to seek guidance and advice. If a Speak Up investigation is not the appropriate approach, they will be guided to and supported to access an alternative process.
- Reports received that are not qualifying disclosures or instances of fraud, theft or bribery will be considered on a case-by-case basis for the most appropriate process or investigation approach.
- Such investigations may be guided by additional policies, for example Safeguarding or Resolution.