The Bribery Act 2010 came into force on 1 July 2011, <u>reforming the criminal law of bribery and corruption</u>, making it easier to take a more proactive approach to tackling these offences in both the public and private sector.

Bribery may be considered as an inducement or reward offered, promised or provided to someone to perform their function of activities improperly in order to gain a personal, regulatory and/or contractual advantage.

The maximum penalty for bribery is ten years imprisonment, with an unlimited fine. Additionally, the Act has introduced a corporate offence of failing to prevent bribery by an organisation not having adequate preventative procedures in place.

NAViGO Community Interest Community, as <u>a not-for-profit social enterprise that</u> <u>emerged from the NHS</u>, follows good NHS business practice and has controls in place to prevent bribery and corruption.

It is vital that everyone working for, or on behalf of, NAViGO CIC is aware of the standards of behaviour expected of them. These standards are detailed in all NAViGO policies – setting out the ethics, professional conduct and probity standards that are expected of all employees in relation to their standards of business conduct. The organisation is working with its staff to raise awareness of the Act.

With one of the six principles of the Act being that there is top level commitment in the organisation to the prevention of bribery, the NAViGO board is committed to this and has agreed ways to communicate the importance of transparency at all times.

As a not-for-profit social enterprise, we are committed to the prevention, deterrence and detection of bribery. There is an expectation that all of our staff, community representatives and any third parties undertaking work on behalf of NAViGO CIC are conscious of, and compliant with, NAViGO procedures and policies.

On behalf of the NAViGO Community Interest Company, I can confirm our commitment to ensuring that all employees of NAViGO CIC are aware of their expectations and responsibilities in relation to the prevention of bribery.