



Maoiniú Teaghais-
Tógála Éireann

Home Building
Finance Ireland

HOME BUILDING FINANCE IRELAND
("HBFI") ANTI-BRIBERY & CORRUPTION
FRAMEWORK

Version 1.0

Please Note: Only print this document if absolutely necessary. Printed versions of this document may be out of date as it will be subject to regular updates.

Version Control

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1. INTRODUCTION

Home Building Finance Ireland (“**HBFI**”) promotes a culture that is committed to maintaining high ethical standards of conduct when performing its duties and has a low appetite for breaches of applicable regulatory/legislative requirements. In particular HBFI operates a zero tolerance policy with respect to bribery and corruption. This position is fully supported by the HBFI Board Members (“**Board**”), the Chief Executive Officer, Senior Management Team, and senior leaders within the organisation. The purpose of this Anti-Bribery and Corruption Framework document (“**the Framework**”), is to summarise the key policies, procedures and controls in place within HBFI aimed at mitigating bribery and corruption risks.

2. GOVERNANCE, ROLES AND RESPONSIBILITIES

Board/Audit and Risk Committee Members

The Board, supported by the Audit and Risk Committee (“**ARC**”), promotes and sets expectations of ethical behaviours and standards, including but not limited to, those set out in the National Treasury Management Agency¹ (“**NTMA**”) Code of Conduct² and the HBFI Board and Committees Code of Conduct. The Board is responsible for setting the risk appetite and overseeing and guiding risk management activity across HBFI. The Board has mandated that risk management be integrated and embedded into the tone and culture of HBFI and this has been adopted across HBFI with all members of the HBFI team responsible for identification and management of risk. Management is responsible for regularly reviewing the risk register and individually confirming that the stated controls are in place. The Audit and Risk Committee is responsible for overseeing the implementation of the HBFI Risk Management Policy and Framework and ensuring that HBFI’s risk management governance model provides appropriate levels of independence and challenge. The Audit and Risk Committee reports to the Board. The Audit and Risk Committee is responsible for the review of the HBFI’s measures in respect of anti-bribery and corruption as detailed in its Terms of Reference.

All employees

Staff assigned to HBFI³ are expected to ensure that they are familiar and comply with relevant policies, procedures and obligations, including those outlined in this Framework.

Oversight and Assurance

HBFI’s Risk Management Policy and Framework is predicated on the three lines of defence model. Within this model, the HBFI team and senior management (first line of defence) incur and own the risks. The HBFI Risk function (the second line of defence) provide independent oversight and objective challenge to the first line of defence. They also provide risk monitoring and reporting. The Internal Audit function acts as part of a third line of defence by providing independent, reasonable, risk-based assurance to key stakeholders on the robustness of the HBFI risk management system, its governance and the design and operating effectiveness of the internal control environment.

¹ HBFI staff are employees of the NTMA that are assigned to HBFI. These staff members are subject to the NTMA’s Code of Conduct in addition to a number of NTMA Policies and Procedures as outlined in Section 3.

² Code of Conduct for NTMA Employees (excluding those assigned to NAMA)

³ For contractors, relevant requirements are detailed in the ‘NTMA Code of Conduct for persons not being Employees of the National Treasury Management Agency’

3. POLICIES AND PROCEDURES

HBFI has adopted and implemented written policies, procedures, and internal controls aimed at mitigating bribery and corruption risk and to comply with anti-bribery and corruption legislation 'the Criminal Justice (Corruption Offences) Act 2018', including inter alia:

- The NTMA **Code of Conduct for employees (including those assigned to HBFI) and the Code of Conduct for Members of the Boards of HBFI and HBFI(L) Board and their Committees** outlines the behaviours expected from all employees and Board/Committee members (the "Codes"). **The Codes prohibit employees and Board/Committee members from, either directly or indirectly, offering or accepting a bribe and from knowingly participating in or facilitating corrupt or illegal activities.**
- The NTMA's **Gifts and Hospitality Policy** applies to all employees. The purpose of this policy is to ensure that employees' actual, potential or perceived conflicts of interest in respect of the receipt of gifts or hospitality are properly managed through all staff being fully aware of their responsibilities to act at all times with the highest level of integrity and to operate under the principle of full disclosure.
- HBFI's **Protected Disclosures Policy** promotes principles of good corporate governance by providing for the reporting and addressing concerns about possible relevant wrongdoing (such as fraud, corruption, bribery or theft). The Protected Disclosures Policy affirms the commitment of HBFI to creating a workplace culture that encourages the making of protected disclosures and provides protection for disclosers.
- The **HBFI AML/CFT Policy** sets out the approach applied by HBFI in managing financial crime risk arising from HBFI's interactions with third parties, with a particular focus on Money Laundering and Terrorist Financing and Financial Sanctions.
- **The HBFI Anti-Fraud Policy** outlines the minimum standards with respect to the overarching governance and management of HBFI's Anti-Fraud risk management arrangements. It sets out minimum standards as part of its anti-fraud strategy including: responsibilities for prevention and detection of fraud; reporting suspected fraud; investigation of alleged fraud and anti-fraud training.
- HBFI expects all employees to act with propriety in personal account transactions, maintaining standards of conduct at the highest level of integrity. The **NTMA Personal Account Transaction Policy is applicable to all staff, including those assigned to HBFI**, and details the arrangements in place designed to mitigate the risk of HBFI employees transacting inappropriately. Board/Committee members are subject to the Personal Account Transaction Policy for members of the HBFI and HBFI(L) Boards and Committees.
- Suppliers of services to HBFI are subject to due diligence in line with the **HBFI Third Party Risk Policy** and appropriate contract clauses are typically provided for with respect to anti-bribery and corruption related requirements as part of the procurement process.
- The Codes outline HBFI's measures in place regarding the identification and management of **conflicts of interest**.
- Contracts for services, supplies or works must be carried out in accordance with relevant public procurement law as further detailed in the **NTMA Procurement Policy**.

4. TRAINING AND COMMUNICATION

Risk-based periodic training and communication is provided to relevant Board/Committee members, employees and contractors in relation to the policies relevant to anti-bribery and corruption. This Framework and related policies are communicated to all employees and/or contractors via the intranet and periodic communications as required.

5. COMPLIANCE WITH THE FRAMEWORK ELEMENTS

The NTMA Policies referenced in section 3, where applicable, have been developed in accordance with the NTMA Policies and Procedures Framework. All employees are expected to comply with relevant policies and procedures and HBFi has an oversight and assurance process in place as described in section 2. Breaches of policy may be dealt with in accordance with the NTMA Disciplinary Procedure and appropriate disciplinary action may be taken.

6. PERIODIC REVIEW

This Framework will be reviewed every two years or more frequently, if required, in light of any legislative or other relevant indicators. The Framework will be reviewed and approved by the Audit and Risk Committee.