

ANTI-FRAUD, ANTI-THEFT AND ANTI-BRIBERY AND CORRUPTION POLICY

Anti-Fraud, Anti-Theft and Anti-Bribery and Corruption Policy

Responsible Officer	Group Director of Governance
This policy is applicable to	Karbon Group
Policy version	9
Date this version implemented	September 2026
Date of next review	December 2028

Policy Statement

Karbon Group (the Group) is committed to being honest, fair and transparent in everything we do. We take fraud, theft, bribery and corruption very seriously and operate a 'zero-tolerance approach' to all forms of dishonest or illegal behaviour.

This policy explains how we work to prevent, identify and deal with fraud, theft, bribery and corruption, and the standards we expect from everyone who works for or with us. This includes colleagues, Board and Committee members, contractors, partners and anyone acting on our behalf.

We have strong systems, clear rules and regular training in place to protect our customers, homes, money and services. These include thorough recruitment checks, clear rules on gifts, hospitality and conflicts of interest, and regular checks and audits to reduce risks.

We encourage people to 'speak up if they have concerns'. Colleagues and members of the public can raise concerns safely and confidentially, and all reports are taken seriously and investigated fairly.

If fraud, theft, bribery or corruption is found, we will act firmly. This may include disciplinary action, recovering losses, and reporting matters to the police where appropriate.

We regularly review this policy to make sure it remains effective, legally compliant and fair, including supporting customers who may be in vulnerable circumstances.

Risk the policy is designed to control

6. Governance and Compliance - Failure to comply with statutory and regulatory requirements and failure in the arrangements for managing the organisation at the highest level

Key performance measures

Reported to GARC on a quarterly basis:

- Number of reported frauds or thefts
- % of managers trained on fraud and theft awareness
- % of colleagues trained on fraud and theft awareness
- Amount of financial loss annually due to fraud/theft
- Assets recovered annually due to fraud or theft investigations
- Length of time any fraud was perpetrated for before discovery
- % of colleagues annually signing up to follow Code of Conduct
- % of colleagues annually completing Declaration of Interests
- % of new starter pre-employment checks completed

Definitions

For the purposes of this policy, a 'colleague' refers to any colleague, Board and Committee member, contractor, agency worker, volunteer, involved resident or external consultant working on behalf of the Group or its subsidiary companies, including any subsidiary housing association.

Abbreviations

AFTBC — Anti-Fraud, Anti-Theft, Anti-Bribery and Corruption

ECCTA — Economic Crime and Corporate Transparency Act 2023

HMRC — His Majesty's Revenue and Customs

NROSH — National Register of Social Housing

UK GDPR — UK General Data Protection Regulation

Policy Detail

1.0 Purpose of policy

- 1.1 The Group is determined that the culture is one of honesty and zero tolerance to fraud, theft, bribery and corruption. These principles must therefore be adopted by all colleagues and will be reflected in our procedures and ways of working in order to assist in the prevention of fraud, theft, bribery and corruption.
- 1.2 This Anti-Fraud, Anti-Theft, Anti-Bribery and Corruption Policy outlines the Groups zero tolerance approach, and our stance on identifying and dealing with fraud, theft, bribery and corruption.

2.0 Objectives

- 2.1 The objectives of this policy are:
 - That all colleagues understand what constitutes fraud, theft, bribery and corruption;
 - To clearly outline the steps the Group takes to deter fraud, theft, bribery and corruption;
 - To clearly outline the offences, how liability arises and potential penalties of fraud, theft, bribery and corruption;
 - Clear procedures for dealing with potential conflicts of interest
 - Clear procedures for reporting and investigating suspected cases of fraud, theft bribery and corruption are located within the Fraud, Theft, Bribery and Corruption Response Plan
- 2.2 This policy is one of a suite of probity policies. The overall objective of the probity policies is to ensure that all individuals and organisations associated in whatever way with the Group act with the highest standards of probity, integrity and

transparency. This policy should be read in conjunction with the following probity policies:

- Speak Out Policy
- Gifts and Hospitality Policy
- Anti-Money Laundering Policy
- Conflicts of Interest Policy
- Related Party Transactions Policy

2.3 The Group colleagues are also required to act at all times in line with the Group's Code of Conduct, which provides guidance to ensure that each colleague's actions and behaviour are consistent with the Group's values and high standards.

3.0 What do we mean by fraud, theft, bribery and corruption?

3.1 Fraud

3.1.1 In accordance with Economic Crime and Corporate Transparency Act 2023 (ECCTA), companies can be held criminally liable if an 'associated person' commits fraud and the company did not have sufficient policies and procedures in place to prevent this from occurring.

3.1.2 The Act can hold an organisation liable if an associated person commits fraud and the company profits or is intended to profit from the fraudulent activity, even if unknowingly.

3.1.3 There are unlimited fines if an organisation is found to be criminally liable for failing to prevent fraud, which would be pursued alongside criminal proceedings for any colleague who carried out the fraudulent activity.

3.1.4 The term 'associated person' includes colleagues, agents, subsidiaries and any person who otherwise performs services for or on behalf of the Group, which includes colleagues of the subsidiaries. An organisation can be found liable if it benefits from a fraudulent act in some way, even if it was the 'associated person' who was initially intended to profit from it. This means that Karbon Homes, as the parent of the Group, may also be held criminally liable for fraud offences committed by a colleague of a subsidiary.

3.1.5 Our Fraud, Theft, Bribery and Corruption Response Plan sets out our procedure for reporting and investigating such instances of fraud, theft, bribery and corruption.

3.2 Offences under the Economic Crime and Corporate Transparency Act 2023 include:

- 3.2.1 **Fraud by false representation** (section 2 Fraud Act 2006): dishonestly makes a false representation and by this intends make a gain for themselves or another, or to cause loss to another or to expose another to a risk of loss. A representation is false if it is untrue, misleading or the person making it knows that it is or that it might be untrue or misleading.
- 3.2.2 **Fraud by failing to disclose information** (section 3 Fraud Act 2006): dishonestly fails to disclose to another person information in which they are under a legal duty to disclose, and by this, intends to make a gain for themselves or another, or to cause loss to another or to expose another to a risk of loss.
- 3.2.3 **Fraud by abuse of position** (section 4 Fraud Act 2006): occupies a position in which they are expected to safeguard, or not to act against, the financial interests of another person and dishonestly abuses that position which in doing so they intend to make a gain for themselves or another, or to cause loss to another or to expose another to a risk of loss. Additionally, a person can have abused their position by way of an omission (a failure to act) as opposed to an act (a positive action).
- 3.2.4. **Participation in a fraudulent business** (section 9, Fraud Act 2006): Sole traders, partnerships, trusts acting with intent to defraud creditors of any person or for any other fraudulent purpose.
- 3.2.5 **Fraudulent trading** (section 993 Companies Act 2006): Applicable to our limited companies within the Karbon Group. Acting with intent to defraud creditors of the company or creditors of any other person, or for any fraudulent purpose.
- 3.2.6 **Obtaining services dishonestly** (section 11 Fraud Act 2006): Obtaining services for themselves or another by a dishonest act and where the person knows that the services will either be paid for in part or not at all.
- 3.2.7 **Cheating the public revenue** (common law)¹¹: dishonest conduct to defraud public revenue, such as the HM Revenue and Customs (HMRC) of money legally owed to them.
- 3.2.8 **False accounting** (section 17 Theft Act 1968): A person dishonestly, with a view to gain for himself or another or with intent to cause loss to another either destroys, defaces, conceals or falsifies any account or any record or document made or required for any accounting purpose or in furnishing information for any purpose produces or makes use of any account which to their knowledge is or may be misleading, false or deceptive.
- 3.2.9 **False statements by company directors** (section 19 Theft Act 1968): A person with intent to deceive members or creditors regarding company affairs, either publishing or concurs in publishing a written statement or account which to his knowledge is or may be misleading, false or deceptive.

3.3 Tenancy Fraud

- 3.3.1 The Group's Tenancy Fraud Policy outlines the Groups approach to identifying and dealing with Tenancy Fraud. If you are required to investigate a tenancy fraud matter, please ensure to read the above policy in conjunction with AFTBC policy and the AFTBC response plan. If you require any support, please reach out to the Governance and Risk team to discuss further.

3.4 Theft

- 3.4.1 In accordance with the Theft Act 1968, theft means the act of dishonestly appropriating property belonging to another, with the intention of permanently depriving the other of it.
- 3.4.2 The types of theft that take place in an organisation can be:
- Theft to receive additional payment, by way of increasing expenses, mileage or overtime
 - Theft of any physical company property
 - Theft by misuse of company data or information

3.5 Bribery

- 3.5.1 In accordance with the Bribery Act 2010, bribery is generally defined as offering, promising, giving or receiving, accepting or agreeing to accept a financial or other advantage to encourage that person to perform their functions or activities improperly, such as with the "improper performance" of a position of trust, or a function that is expected to be performed impartially or in good faith, or to reward that person for having already done so. Bribery does not have to involve cash or an actual payment exchanging hands and can take many forms such as a gift, lavish treatment during a business trip or tickets to an event. Please also refer to our Gifts and Hospitality for more information on bribery and making gifts and hospitality declarations in line with the above legislation.
- 3.5.2 As with ECCTA legislation detailed above, the Bribery Act also has a failure to prevent bribery offence. Organisations can be held criminally liable if an 'associated person' commits bribery and the organisation did not have sufficient policies and procedures in place to prevent this from occurring. 'Associated person' means colleagues, agents, subsidiaries and any person who otherwise performs services for or on behalf of the Group. Fines and penalties apply for the organisation alongside criminal proceedings for the colleague who engaged in bribery.
- 3.5.3 The types of bribery that take place in an organisation can be:

- bribery to secure or keep a contract or secure an order
- bribery to gain any advantage over a competitor
- bribery of a local or national official to secure a contract or funding
- bribery to turn a blind eye to a health safety issue or poor performance or substitution of materials or false labour charges
- bribery to falsify an inspection report or obtain a certificate

3.6 Corruption

3.6.1 Corruption occurs where the integrity of a person or a company is manipulated and compromised for somebody's own personal gain. Often, this involves entering into a secret agreement with another party to gain an advantage.

3.6.2 The types of corruption that take place in an organisation can be:

- Misuse of company assets or resources
- Altering company information
- Abuse of position to further a colleague's own interests, or interests of their family and friends, or failure to declare a conflict of interest
- Any involvement in money laundering

3.7 Penalties for fraud, theft, bribery or corruption

3.7.1 The Group will deal swiftly and firmly where evidence of fraud, theft or corruption is found. The Group will be robust in dealing with financial malpractice.

3.7.2 All instances of fraud, theft, bribery or corruption by Group colleagues will be dealt with under the Group's Disciplinary Policy.

3.7.3 Allegations of fraud, theft, bribery or corruption will be referred to the police if it is suspected that criminal activity has occurred and there appears to be sufficient evidence to support a prosecution under the Fraud Act 2006.

3.7.4 The Group will, where it considers it necessary, prosecute instances of fraud, theft, bribery and corruption where it is in the public interest to do so.

3.7.5 The penalties for fraud vary depending on the level of culpability, impact and harm caused, ranging from fines, community orders to custodial sentences of up to 10 years imprisonment.

3.7.6 The Group will consider all forms of restitution to recover any losses arising where appropriate, i.e. pension funds, final salary, civil court case etc.

3.8 Malicious Allegations

3.8.1 If any allegation of fraud, theft, bribery or corruption is made frivolously, maliciously or for personal gain, disciplinary action may be taken against the individual concerned, where the individual making the allegation is a Group colleague. Where

the individual making the malicious allegation is a member of the public, the matter may be referred to the police where appropriate.

3.9 How do we combat fraud, theft, bribery and corruption?

3.9.1 A top level commitment

- 3.9.1.1 The responsibility for the prevention and detection of fraud, theft and corruption rests with those charged with the governance of the Group. This includes the Group and subsidiary board of directors, executive directors and senior management. Those responsible for the governance of the Group are committed to preventing fraud, theft and corruption at all levels, fostering a culture of both integrity and openness and a zero-tolerance approach.
- 3.9.1.2 We are committed to rejecting all financial or organisational advantages or benefits by way of fraud, theft or corruption, even if this translates to incurring any organisational losses, missed opportunities and delays.
- 3.9.1.3 The Group recognises the importance of adopting a zero-tolerance approach to fraud, theft and corruption which in turn promotes a culture of integrity and ethical behaviour. It also provides for a safe and secure environment for our customers, our colleagues, our contractors, suppliers and partners, providing confidence and assurance that we will always choose to act with integrity.

3.10 Culture

- 3.10.1 We are committed to embedding a culture of honesty and zero tolerance of fraud, theft, bribery and corruption, the Group Board, subsidiary boards and senior management teams commit to leading by example at all times. Like all colleagues, the boards and senior management teams agree to act in accordance with the principles of the Code of Conduct. These principles are: acting in the best interests of the Group and its residents; behaving with integrity; conducting themselves professionally and treating others well; and protecting themselves, others and the environment. These principles are reflective of the principles of public life, as established by the Committee on Standards in Public Life.
- 3.10.2 The Group's culture of honesty and commitment to the principles of the Code of Conduct are underpinned by our foundation values, which are:
 - Reliable:** We use our knowledge and experience to be effective and efficient, and make sound, well-informed business decisions with integrity
 - Thoughtful:** We work hard to understand the needs and aspirations of others and are mindful of our impact on people, communities and the environment.

3.10.3 All colleagues are made aware of the standards and behaviours expected of them. The Group commits to ensuring that clear policies and procedures are established in opposition to fraud, theft and corruption. In addition to this policy, related policies include:

- Code of Conduct
- Gifts and Hospitality Policy
- Anti Money Laundering Policy
- Speak Out Policy
- Conflicts of Interest Policy
- Travel & Expenses Policy
- ICT Acceptable Use Policy

3.10.4 Colleagues are made aware of their responsibilities in line with these policies and procedures during the onboarding process when they join the Group and then through further training and briefings as appropriate.

3.11 Prevention, Deterrence and Detection

3.11.1 The Group will reduce the risk of fraud, theft, bribery and corruption by:

- adopting an Anti-Fraud, Anti-Theft and Anti-Bribery and Corruption Policy in line with the current legislation
- having a Fraud, Theft, Bribery and Corruption Response Plan, in conjunction with the above policy, providing clear guidance on reporting and conducting such investigations
- having a Fraud, Theft, Bribery and Corruption Prevention Plan, which provides detailed guidance on our approach and risk management
- having in place a Code of Conduct that applies equally, across the Group, to colleagues, board and committee members, agency staff, volunteers, involved residents and external consultants;
- having thorough recruitment procedures;
- actively analysing and monitoring the risk of fraud, theft, bribery and corruption;
- providing sufficient resources for internal audit and the effective control of systems
- having procedures for recording offers of gifts and hospitality and a register of interests
- periodically reviewing the Group's Financial Regulations, as laid out in the Group Delegatory Framework, to ensure that proper controls exist and that management responsibilities are clear
- ensuring that colleagues are aware of the Group's Speak Out Policy and that we have an open culture where colleagues feel comfortable to raise concerns
- providing appropriate training for colleagues and a commitment to fraud specific training dependant on the requirements and risk of each directorate

3.11.2 The above preventative measures will also have the effect of deterring fraud, theft, bribery and corruption. In addition, they will be deterred by:

- a robust approach to considering prosecution of all cases of suspected fraud and theft from within and outside the organisation
- taking disciplinary action against board members, committee members and colleagues where there is evidence of fraud, theft, bribery or corruption, whether or not criminal proceedings are appropriate
- giving publicity to the fact that the Group has robust anti-fraud, -theft, -bribery and -corruption measures in place and to individual instances of successful prevention or detection.

3.11.3 While the main protection against fraud, theft, bribery and corruption is prevention, the Group also has measures in place to detect any irregularity once it has occurred.

Proactive measures include:

- Adequate management controls and division of duties
- Regular internal and external audit checks according to the degree of risk
- Adoption of secure procedures recommended by internal and external audit and other bodies.

Reactive measures include:

- Encouraging colleagues and members of the public to speak out where they are aware of potential fraud, theft, bribery or corruption
- An internal auditor to investigate irregularities on behalf of management.

3.11.4 All colleagues are an important element of the Group's stance on fraud, theft, bribery and corruption and are positively encouraged and expected to raise any concerns that they may have on these issues. This can be done through the Speak Out Policy in the knowledge that such concerns will be treated in confidence and investigated properly and fairly.

3.11.5 Members of the public may report concerns through the Group's complaints procedure.

3.11.6 The Group will always pursue fraud, theft, bribery and corruption as vigorously as possible through its disciplinary procedures or, if necessary, through the courts.

3.11.7 In addition, the Group is required to report any incidents of fraud or attempted fraud to the Regulator via NROSH on an annual basis. The Regulator advises that 'where such activity does occur it may be appropriate for a provider to advise the Regulator of individual frauds as they occur'.

3.12 Declaring Conflicts of Interest

- 3.12.1 Colleagues are expected to take all reasonable steps to ensure that no undeclared conflict arises, or could reasonably be perceived to arise, between their duties with the Group and their personal interests, financial or otherwise. This includes the need for colleagues to consult with their line manager before taking on any work outside the Group. Clear rules around conflicts of interest are outlined for all colleagues in the Conflicts of Interest Policy and Procedure.

3.13 Clear rules on Gifts and Hospitality

- 3.13.1 Clear rules around offering and accepting gifts and hospitality are outlined for all colleagues in the Gifts and Hospitality Policy and Procedure.

3.14 Clear Anti-Money Laundering stance

- 3.14.1 The Group's policy is to do everything possible to prevent the Group and its colleagues being exposed to money laundering, to identify the potential areas where it may occur, and to comply with all legal and regulatory requirements. This is clearly outlined for all colleagues in the Anti-Money Laundering Policy and Procedure.

3.15 Clear rules on Related Party Transactions

- 3.15.1 Clear rules on the disclosure of related party transactions between the Group and related parties are outlined in the Related Party Transactions Policy.

4.0 Customer Vulnerabilities

- 4.1 This policy is applied in line with our Customers in Vulnerable Circumstances Policy. We want people to be treated fairly, have equality of opportunities, freedom, respect, and access to our services.
- 4.2 We will support people in vulnerable circumstances to help us deliver this service. We will work alongside external agencies such as social services, the police and fire services and other appropriate agencies to help and support people in vulnerable circumstances and to ensure we meet our statutory and regulatory requirements as a social landlord.
- 4.3 Policies and key information are made available on our website.

5.0 Monitoring and Review

- 5.1 The Company Secretary is responsible for the monitoring and review of this policy and report any instances of fraud, theft, bribery or corruption to the Group Audit and Risk Committee.
- 5.2 This policy will be reviewed at least every 3 years.

- 5.3 Policy review will be undertaken before the expected review date if there are significant changes to legislative or regulatory requirements, good practice or any other situation arises that makes a review necessary.

6.0 Equality and Diversity

- 6.1 This policy is applied in line with our Inclusion and Belonging Policy. This includes the legal requirements of the Equality Act 2010, Workers Protection Act 2023 and the Public Sector Equality Duty.
- 6.2 At the Karbon Group we aim to eliminate discrimination, promote equality of opportunity, foster good relations and define the nine protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.
- 6.3 If you would like this or any other policies in a different language or format please contact inclusion@karbonhomes.co.uk.

7.0 Data Protection and Privacy

- 7.1 We have a clear policy on data protection and sharing data with other partners/third parties under the requirements of the UK General Data Protection Regulation, the Data Protection Act 2018 and other associated legislation. This is clearly set out in the Data Protection Policy for the Karbon Group which, along with its associated procedures, must be followed throughout the operation of this policy.

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Approved by	Group Board
Date approved	3 December 2025
Frequency of review	This policy will be reviewed at least every 3 years; or more frequently where there are changes to relevant legislation, regulation, or best practice. The Board will be notified annually of any material changes to the policy.
Last reviewed by	Group Governance and Risk Manager.
Date of last review	December 2025
Key related documents (policy, procedure, customer literature)	Code of Conduct Speak Out Policy Gifts and Hospitality Policy Anti-Money Laundering Policy Conflicts of Interest Policy Tenancy Fraud Policy Disciplinary Policy The Group Delegatory Framework Travel & Expenses Policy ICT Acceptable Use Policy Related Party Transactions Policy
Sources of best practice or guidance used in developing this policy	Legacy policy; Fraud Act 2006; Proceeds of Crime Act 2002 and Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 The Money Laundering and Terrorist Financing (Amendment) Regulations 2019 Bribery Act 2010 Theft Act 1968 Economic Crime and Corporate Transparency Act 2023
Author of this policy version	Senior Business Partner (Governance, Risk & Assurance)

Document change history		
Version	Date	Changed sections
2	28/6/2018	Fraud Act 2006 Various
3	28/11/2019	Full review of policy; name change from Anti-Fraud and Anti-Theft Policy
4	28/09/2020	Update of Key Performance Measures, relevant legislation and regularity of policy review
5	27/09/2021	Update of Sources of best practice or guidance used in developing this policy to include The Money Laundering and Terrorist Financing (Amendment) Regulations 2019.

		Policy applicable to:-changed Non-Executive directors to Board and Committee members and included volunteers and external consultants. Updated sections regarding Equality and Diversity and Data Protection.
6	01/02/2023	Clarification that approval route is the Group Board; addition of Conflicts of Interest Policy and Related Party Transactions Policy as related documents; update of performance indicators to include colleague as well as manager training; update of the culture section in line with the Code of Conduct 2022; update of statement on to whom the Code of Conduct applies; update of Declaring Conflicts of Interest section to signpost to new Conflicts of Interest Policy; removal of Conflicts of Interest appendix as now superseded by new policy; new section to signpost to Related Party Transactions policy; removal of Speak Out procedural information in appendix and signposting to Speak Out Policy and Procedure; update of references to YHA to any subsidiary housing association.
7	10/10/2024	Use of Group throughout the policy. Any use of employee changed to colleague. The Executive Director of Governance and Integration title amended to Company Secretary. The Assistant Director of Governance, Risk and Assurance title removed. Consistent formatting of Probity policies. Section 3 – Fraud definitions have been amended pursuant to Fraud Act 2006. Additional of section 7 Failure to Prevent Fraud pursuant to Economic Crime and Corporate Transparency Act 2023. New appendix 1 procedure includes process map. Process map details that reporting colleagues/ management to be provided with outcome of investigation insofar as reasonably practicable.
8	08/12/2025	Renaming policy to Anti-Fraud, Anti-Theft and Anti-Bribery and Corruption Policy Further details added in respect of Economic Crime and Corporate Transparency Act 2023, the offences, impact on the organisation and penalties. Further details on Bribery Act 2010, the failure to prevent offence, impact on the organisation and penalties. Further details added on Theft Act 1968 and Corruption section Tenancy Fraud section and brought together with Fraud section Penalties and malicious allegations brought together within Fraud section New section on 'top level commitment' under section 6.0.

		Removal of procedural elements of fraud, theft, bribery and corruption reporting and creation of a Fraud, Theft, Bribery and Corruption response plan which sits alongside policy. Imogen Potter job title changed to Group Governance and Risk Manager.
9	24/09/2026	Update to new policy template including revised numbering and updated policy statement, amendment to KPIs to include reporting framework and addition of Customer Vulnerabilities, name change from KMT to KLT

Equality Impact Assessment	
Equality Impact Assessment (EQIA) Screening	EQIA Date: 06/08/2019 full assessment not required

Consultation		
Consultation Group	Needs to be consulted when ...	Date of Consultation
Colleague Forum	Where a new policy or major policy change affects colleagues	September 2019
Unions	Where a new policy or major policy change affects colleagues	September 2019
Customers (including customers of subsidiaries)	Where a new policy or major policy change affects customers	N/A
54North colleagues	To agree any wording needed in the policy to reflect differences in 54North structure and processes	Adopted, no exceptions 23/01/2026
Inclusion and Belonging	An updated EQIA must be completed every time there is a new version of the policy	06/08/2019
Data Protection	The Data Protection team must be consulted every time there is a new version of the policy as an updated DPIA may be required.	23/07/2019
Legal	For all new policies or major policy changes to consider if there are any legal implications and check if a legal review or advice is required	N/A
Corporate Health and Safety Group	For health and safety policies	N/A
KLT	Approves minor changes. (Circulate to KLT major policy changes/ new policies for awareness and any feedback)	N/A

Exec Team	Approves major changes to non-key policies. (Circulate to Exec major policy changes/ new policies for awareness and any feedback)	N/A
Board Committees	Scrutinise new key policies or major changes to key policies in their areas. Approve specific key policies outlined in Group Delegatory Framework.	N/A
Subsidiary boards	Review and agree adoption of any new policies/major key policy changes going to Group Board	N/A
Group Board	Approve new key policies and major changes to key policies	03/12/2025