

Anti-Fraud, Bribery and Corruption Statement

Operose Health is committed to eliminating fraud, bribery and corruption across the organisation. Fraud is an act of deception that is intended to make a financial gain or to cause a loss to another party. Bribery is generally defined as the giving or receiving of a financial or other advantage in exchange for improperly performing a relevant function or activity.

The Failure to Prevent Fraud offence was introduced as part of the Economic Crime and Corporate Transparency Act 2023 and came into force on 1 September 2025. Operose Health is committed to having reasonable fraud prevention procedures in place following the six principles of top-level commitment, fraud risk assessment, prevention procedures, due diligence procedures, communication including training, and monitoring/review.

The organisation has a zero-tolerance approach to fraud, bribery and corruption and is committed to applying the highest standards of ethical conduct and behaviour, as well as having robust controls in place to prevent fraud, bribery and corruption. As well as staff, Operose Health also expects its suppliers and contractors to adhere to the same high standards.

Our dedicated policies and procedures set out our expectations and guidance for staff, contractors and anyone else working with or for us, with regards to preventing fraud, bribery and corruption, and raising concerns. Key policies include the Anti-Fraud, Bribery and Corruption Policy, Conflict of Interest and Declarations (including gifts and hospitality, and Freedom to Speak Up Policy).

We ask all who have dealings with Operose Health, as employees, agency staff, trading partners (contractors/suppliers), stakeholders and service users, to help us in our fight against fraud, bribery and corruption and to contact us immediately if any concerns arise. No individual will suffer any detrimental treatment as a result of reporting reasonably held suspicions. The success of our anti-fraud, bribery and corruption measures depends on everyone playing their part.

Colleagues can raise a concern about risk, malpractice, wrongdoing, bribery, or fraud that they think is causing harm. Concerns will be fully investigated, and outcomes and actions shared with the colleague raising the concerns through the work in confidence platform.

All genuine suspicions of fraud, bribery and corruption must be reported directly to a member of the Governance Team via the Reporting Anti-Fraud, Bribery and Corruption Procedures and Fraud, Bribery and Corruption Referral Form.

Alternatively, all suspicions of fraud, bribery or corruption within Operose Health can also be reported in confidence to the NHS Fraud and Corruption Reporting Line on free phone 0800 028 40 60 or at: <https://cfa.nhs.uk/reportfraud>

(Independent healthcare sector organisations such as Operose Health are included in the NHS Counter Fraud Authority remit).



Chief Financial Officer