

Corruption & Bribery Category	Detail	Relevant to NPA	Scoring November 2020			Scoring April 2023			DRAFT Scoring March 2025			Trend	Comments Provided (October 2025)
			Impact	Likelihood	Total	Impact	Likelihood	Total	Impact	Likelihood	Total		
Bribery	Payment of agency/facilitation fees (or bribes) in order to secure a contract.	Y	2	2	4	2	2	4	2	2	4	No change	No change on previous review. Risk is relevant with low value contracts
Bribery	Payments to government officials to obtain a benefit (e.g. customs officials, tax inspectors).	Y	2	2	4	2	2	4	2	2	4	No change	No change on previous review. Risk is relevant with role as Planning Authority. Larger applications with higher impact have increased governance
Bribery	Anti-trust activities such as price fixing or bid rigging.	N	-	-	-	-	-	-	-	-	-	-	-
Bribery	Illegal political contributions.	Y	1	1	1	1	1	1	1	1	1	No change	No change on previous review. Risk is relevant in our role as Planning Authority
Bribery	Authorising orders to a particular supplier in return for bribes.	Y	2	3	6	2	2	4	2	1	2	Decrease	Decreased as a result of revised Finance Policy and Procurement Audit Recommendations
Bribery	Giving and accepting payments to favour or not favour other commercial transactions or relationships.	Y	2	3	6	2	2	4	2	2	4	No change	
Extortion	Extortion (offering to keep someone from harm in exchange for money or other consideration).	Y	3	1	3	3	1	3	3	1	3	No change	Decreased as a result of revised Finance Policy and Procurement Audit Recommendations
Extortion	Blackmail (offering to keep information confidential in return for money or other consideration).	Y	3	1	3	3	1	3	3	1	3	No change	No change on previous review. Risk is considered relevant but likelihood low
Kickbacks	Kickbacks to senior management in relation to the acquisition of a new business or disposal of part of the business.	Y	3	1	3	3	1	3	3	1	3	No change	No change on previous review. Risk is considered relevant but likelihood low. Controls with Exec and Board governance of property decisions
Kickbacks	Employee sells company-owned property at less than market value to receive a kickback or to sell the property back to the company at a higher price in the future.	Y	3	1	3	3	1	3	3	1	3	No change	No change on previous review. Risk is considered relevant but likelihood low. Controls with Exec and Board governance of property decisions
Kickbacks	Purchase of property at higher than market value in exchange for a kickback.	Y	3	1	3	3	1	3	3	1	3	No change	No change on previous review. Risk is considered relevant but likelihood low. Controls with Exec and Board governance of property decisions
Kickbacks	Kickbacks to employees by a supplier in return for the supplier receiving favourable treatment.	Y	2	3	6	2	2	4	2	2	4	No change	
Kickbacks	Preferential treatment of customers in return for a kickback.	Y	2	3	6	2	2	4	2	2	4	No change	
Personal interests	Transfer of knowledge to a competitor by an employee who intends to join the competitor's company	N	-	-	-	-	-	-	-	-	-	-	-
Personal interests	Misrepresentation by insiders with regard to a corporate merger, acquisition or investment.	N	-	-	-	-	-	-	-	-	-	-	-
Personal interests	Insider trading (using business information not released to the public to gain profits from trading in the financial markets).	N	-	-	-	-	-	-	-	-	-	-	-
Personal interests	Favouring a supplier in which the employee has a financial interest.	Y	2	2	4	2	1	4	2	1	2	No change	Procurement Procedures and Finance Policy updated
Personal interests	Collusion with customers and/or suppliers.	Y	2	2	4	2	2	4	2	2	4	No change	
Personal interests	Employee hiring someone close to them over another more qualified applicant.	Y	2	2	4	2	2	4	2	2	4	No change	
Personal interests	Employee setting up and using own consultancy for personal gain (conflicts with the company's interests).	Y	2	1	2	3	2	6	3	2	6	No change	