



'not just what to do, but more importantly how to do it.'

# Anti-bribery Policy

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**This Policy is not intended to act as or replace existing operational procedures.**

Unique ID:	Anti-bribery Policy
Version: Approved by:	INSERT NAME
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## Background

Bribery is a broad term covering various forms of abuse of an individual or organisations power for private gain or illicit benefit. It is the act of giving, requesting, or accepting any financial advantage intended to induce the recipient to act improperly in the performance of their duties or to reward them for undertaking such activity. The bribery act 2010 is a piece of UK legislation that makes bribery illegal in the UK and provides for UK companies to be held liable for failing to implement adequate procedures to prevent such acts taking place by those working within their organization, no matter where in the world the act takes place. Individuals found guilty under the act face imprisonment for up to ten years and as a company (insert company name) could face unlimited fines and face severe damage to the reputation and brand.

## Scope & Coverage

(Insert company name) conducts its business in an honest, ethical & lawful manner at all times, and as an integral part of this commitment, we will implement appropriate measures to prevent and/or detect bribery across the business and to investigate all known or suspected instances. This policy sets out (insert company name) commitment to preventing, detecting & reporting bribery and is to be read, understood and adhered to by all employees working directly and indirectly for (insert company name). This policy will be reviewed annually.

## Policy Statement

(Insert company name) has a zero -tolerance approach to bribery. This policy is to provide clear guidance of what is not acceptable to ensure every person acts in accordance with our values. (Insert company name) prohibits: the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company, or by any individual employee, agent or other person or body acting on the companies behalf, in order to gain any commercial, contractual or regulatory advantage for the company, in a way which is unethical/inappropriate as defined in the Bribery Act 2010.

## Responsibility & Accountability framework.

In relation to preventing bribery the Senior leadership team/ board (delete/ insert as appropriate) will commit to the following:

- Define and communicate a clear policy setting out the company's position to prevent, detect, investigate, and report on any identified bribery cases.
- Provide employees training and guidance on how to spot fraud and report instances and/or concerns.
- Encourage and open, transparent culture amongst all employees and supply chain partners to be able to approach the senior leadership team and report concerns anonymously and confidentially should this suit any whistle blowers, at any time.

Line managers are responsible for:

- Ensuring that their teams are aware of this policy, understand and feel comfortable to report any known instances of bribery.
- Monitor bribery risks and take appropriate preventative or investigative measures to implement in high-risk areas.
- Ensure any reports given to them are treated discreetly, explored and logged fully, actioning investigation without delay, and if protecting the individuals proving the information confidentially should this arise and be stated by the individuals raising concerns.

All employees are responsible for:

- Reading this policy and understanding fully.
- Complying with the requirements to notify any suspicious or known actions of identified bribery and maintaining vigilance.

## Requirements for preventing, detecting, reporting & investigating bribery.

(Insert company name) prevention measures will be based on a completed risk assessment to focus on high-risk areas. The measures will reduce opportunities for bribery and will include analysis of data through our central system to identify any weaknesses to improve and strengthen existing controls and plug any gaps that need attention. Also by encouraging an open ethical culture for any employees to be able to raise concerns confidently, the senior leadership will welcome such conversations and information provided.

Although often acts of bribery are well hidden in workplaces, we will endeavor to monitor systems, assess risks on an ongoing basis, spot any anomalies and focus on behavioral indicators to help aid all investigations to resolve any instances.

Any individual with reasonable concerns relating to known or suspected bribery should discuss these with line managers at the earliest opportunity without delay. The Senior leadership will engage with other associated resource as and when needed to fully investigate all instances, record all related details and escalate internally to the board and externally should the matter need this intervention.

## Signature Page

Senior leadership team

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Date \_\_\_\_\_

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Date \_\_\_\_\_

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Date \_\_\_\_\_