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ANTI-BRIBERY POLICY

This policy document applies to your employment at [*Insert organisation and address*], the "Organisation" and all other Organisation sites that you may be asked to work at from time to time.

For any policy to be effective it must be applied throughout the Organisation, this policy therefore applies to all staff regardless of position or seniority.

1. Policy Statement

1.1 This Organisation is committed to complying with the Bribery Act 2010 and all legislation that adds to or supersedes the Act.

1.2 The Organisation will provide practical advice and training to both new employees and existing employees operating in new territories to make them aware of the risks of bribery.

1.3 Where appropriate the Organisation will carry out risk assessments when entering into either a new geographical territory or new product market.

1.4 Furthermore the Organisation will undertake due diligence when entering into business with new third parties or engaging third parties to act upon behalf of the Organisation.

1.5 The Organisation will continually monitor its policies and practices to ensure that the Act is complied with. Every executive, manager and employee has a responsibility to follow and implement this policy.

2. Bribing a Person

Under the Act it is an offence to directly or indirectly offer, promise or give a financial advantage to another. Where the intention is to induce another person to perform a relevant function or activity improperly or reward such action, or where the acceptance of the bribe itself constitutes improper performance of a relevant function

or activity.

3. Accepting a Bribe

It is an offence where a recipient or potential recipient of a bribe requests, agrees to receive or accepts a financial or other advantage with the intention that a relevant function will be performed improperly by them. Or that by agreeing to the above a relevant function is itself performed improperly. Or improper performance is rewarded. Or is improperly performed in anticipation of a bribe. It is irrelevant if the improper performance is carried out by the actual recipient of the bribe or another person.

4. Bribing a Foreign Public Official

It is an offence to offer, promise or give a financial or other advantage to a foreign public official, with the intention of influencing the official in the performance of their official duties. The person offering the bribe must also have the intention to obtain or retain business or obtain an advantage.

5. Failure to Prevent Bribery

The Organisation will be liable under the Act if a person associated with it bribes another party with the intention of obtaining or retaining business or gaining an advantage.

Sample document – the remaining are clause headings only
Full document contains all clauses

6. Reporting

7. Duty to Act

8. Senior Management and Organisation Liability

9. Clear Communication

10. Date of Implementation

11. Questions

12. Alteration of this Policy

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