

ANTI CORRUPTION POLICY

A FU⁺UREPLUS GUIDE

WHAT IS AN ANTI- CORRUPTION POLICY?

An **anti-corruption policy** should sit alongside any guidelines you set out for your employees on offering or accepting bribes.

The policy should act as an **organisational statement** addressing the risk that an employee of your business, or someone working on your behalf, may be exposed to **bribery** or **corruption** in the working environment.

It should be structured in a way that is **appropriate to the level of risk** your business faces in these areas. Sadly some industries tend to be more vulnerable to corruption than others, but **corruption can take many forms** and no organisation or sector is exempt from risk.

YOUR POLICY



Having an **adequate anti-corruption policy** in place is essential in order to lessen any risks and **protect** your business from the legal, reputational and/or financial implications of being involved in a corruption or bribery offence.

You will not be held liable for the offence of failing to prevent bribery if you can show that your organisation had **adequate procedures in place** to prevent bribery.

What is corruption?

Corruption is a broad term, but in a business context it refers to the risk that directors or employees may not always act in an entirely honest or ethical manner.

An anti-corruption policy should therefore set-out **clear guidance** on how employees of your business should conduct themselves, i.e. behaving with integrity and conducting business in a professional and fair manner.

YOUR POLICY



What is bribery?

As bribery is one of the most **common forms** of corruption, it is usually dealt with more explicitly within the broader context of an anti-corruption policy.

A bribe is an offer to give or receive a financial or other reward to another person, in order that they perform their job, or aspect of their work, improperly. Offering or receiving a bribe is **illegal and punishable under UK law**.

Be aware that:

- Offering to do something improper, even if the offer isn't physically followed through, is considered a bribe.
- Anti-bribery laws apply **anywhere in the world**, and cover the offer of as well as the acceptance of bribes.
- Your company is responsible for bribes offered or accepted not only by directors and employees, but also by contractors or agents acting on behalf of your company.

WHAT SHOULD THE POLICY COVER?

- + TYPES OF CORRUPTION**
Highlight the meaning and effects of different types of corruption, and provide guidance for employees on how to identify and prevent it.
- + POLICY APPLICATION**
Explain that the policy applies to everyone within the organisation, no matter how large or small their role.
- + SET EXPECTATIONS**
Set out clearly how you expect employees to conduct themselves when they are representing your business.
- + COMPLIANCE WITH UK LAW**
Make sure your policy complies with the [UK Anti-Bribery Act](#), setting out rules on how your employees should handle potential bribes, including a link to your **whistle-blowing policy**.
- + DEFINE BRIBERY**
Provide a legal definition of bribery, and clearly outline the difference between gifts and bribes, providing clear examples.
- + BE CLEAR ON THE RULES**
Set out rules for agreeing to receive gifts, hospitality or donations, and rules on avoiding or stopping conflicts of interest.

OTHER THINGS TO CONSIDER

1

An anti-corruption policy can be a **standalone** policy or form part of your **Employee Handbook**. It is also important to include a section on anti-corruption and anti-bribery in your **supplier code of conduct**.

2

Communicate your policy to your staff and partners. This will **raise awareness** and help to deter bribery by making it clear how your organisation does business. You may want to think about **additional training** or awareness building as your business grows.

3

Monitor and review your policy regularly. The risks your business faces are likely to change over time, therefore make sure your policy is **up-to-date** and accurately reflects any corruption or bribery risks you face, for example when entering new markets.

NEED MORE HELP?

As an additional service we can supply a structured template for an anti-corruption policy. We also offer consultancy services if you would like more comprehensive support, for example carrying out a risk assessment on the corruption risks your business might face. This may be particularly helpful if you are researching new markets or business arrangements.

Please let us know if you would like more information - we would be happy to provide a quote for either service: team@future-plus.co.uk

