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| ~ Your Company ~ | | | | | |
| Policy No. |  | Date ratified |  | Version No |  |
| Approved by |  | Ratified by |  | Review date |  |
|  | **BRIBERY AND ANTI-CORRUPTION POLICY**  **(Incorporating Acceptance of Gifts Policy and Procedure)** | | | |  |

## About this Policy

It is our policy to conduct all of our activities in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all of our dealings and relationships. Breaches of this policy are likely to be serious and result in immediate disciplinary action. This may lead to immediate dismissal, civil and criminal proceedings.

All staff members and officers of the Company are required to observe and respect the provisions of this policy at all times, as are all other people associated with the Company. Bribery and corruption are not issues that only affect large transnational corporations: they affect us as well.

Members of our organization should familiarise themselves with this policy to ensure that their conduct does not create a situation that could give rise to bribery or corruption. Ensuring that the Company operates free from bribery and corruption is not just a cultural commitment on the behalf of the Company: it is a moral, social and legal requirement of all of our staff and officers.

## What is Bribery?

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise the issue with [DETAILS or one of the Directors].

Specifically, you must not:

* give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, for the Company or its members or to reward any business received;
* accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
* give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;

You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Penalties for individuals engaging on bribery or corruption can be severe and can include up to 10 years imprisonment. Organisations like ours can face unlimited fines if one of our staff engages in bribery or corrupt activity. It is therefore in your interests, as well as ours, that you act with propriety, integrity and professionalism at all times.