

Anti-Bribery & Corruption

Policy · UK · Updated 2026-07-23 · Square brackets are placeholders to replace with your own details.

An anti-bribery and corruption policy sets out your organisation's rules on gifts, hospitality, payments, and inducements — what is acceptable, what is prohibited, and what to do when something feels wrong. It is how a business shows it takes the Bribery Act 2010 seriously before anyone asks it to prove it.

Bribery risk in a small business rarely looks like a briefcase of cash. It looks like supplier hospitality that becomes harder to refuse each year, a "fee" to speed up an overseas shipment, or a buyer hinting at a personal thank-you for the contract. Clear written rules protect staff in those moments as much as they protect the business.

This template covers prohibited conduct, gifts and hospitality limits and the register that evidences them, facilitation payments, donations, red flags, and how to raise a concern.

Purpose and scope

This policy applies to everyone acting for or on behalf of [Your company]: employees at every level, directors, and any agents, contractors, consultants, or business partners acting on our behalf [adjust to your supply chain].

It applies to all our dealings, in the UK and abroad, with private businesses and with public officials, in and outside working hours.

Policy statement

[Your company] does not offer, give, request, or accept bribes, directly or through others, for any purpose. We will walk away from business that cannot be won honestly, and we will support any member of staff who loses a sale, a contract, or a delivery slot by refusing to pay or accept a bribe.

What is prohibited

- Offering, promising, or giving anything of value to improperly influence a decision — money, gifts, hospitality, jobs for relatives, favours.
- Requesting, agreeing to accept, or accepting anything of value in return for favourable treatment.
- Bribing a public official, in the UK or anywhere else, including through intermediaries.
- Facilitation payments — small unofficial payments to speed up routine actions.
- Using agents, distributors, or partners to do anything this policy prohibits.
- Concealing any of the above, including by falsifying invoices, expenses, or records.

Gifts and hospitality

Normal, proportionate business hospitality — a working lunch, modest event tickets, branded low-value items — is a legitimate part of building relationships and is not prohibited. The tests are openness, proportionality, and timing.

- Gifts and hospitality must be reasonable in value, occasional, and never in cash or cash equivalents such as vouchers.
- Never give or accept anything of value while a tender, negotiation, or contract renewal with that party is live. [Adjust to your sales cycle.]
- Declare anything given or received with a value over £[amount] to [name/role] for entry in the gifts and hospitality register, held in [system/location].
- When in doubt, declare it — an entry in the register is never a problem; an undeclared gift always is.

Facilitation payments and donations

Facilitation payments are bribes under UK law and are prohibited, even in countries where they are customary. The only exception is where a payment is demanded under duress and personal safety is at immediate risk — pay, then report it to [name/role] as soon as safe, and record it.

Charitable donations and sponsorships are made only with the approval of [name/role], to organisations we have checked, and never to win or influence business. [Your company] does not make political donations. [Adjust if your position differs.]

Responsibilities and red flags

- [Name/role] owns this policy, the register, and the risk assessment behind it.
- Managers apply the rules in their teams and raise higher-risk situations — new export markets, new agents, public sector tenders — before committing.
- Everyone must refuse bribes, decline improper requests, and report concerns.
- Red flags to report: requests for cash or payments to unrelated accounts, commissions or fees with no clear service behind them, an intermediary who insists on secrecy, invoices that do not match the goods or services, or an official who asks for a payment to "help things along".

Raising concerns and breaches

Report suspected bribery, or any request that feels improper, to [name/role] or through the whistleblowing policy. Concerns are investigated confidentially, and nobody suffers a detriment for a good-faith report — including for refusing to pay a bribe, whatever the commercial cost.

Breaches of this policy are gross misconduct and may lead to dismissal, termination of contracts with third parties, and referral to the authorities.

Training, records, and review

All staff cover this policy at induction; staff in exposed roles — purchasing, sales, anyone dealing with public bodies or overseas partners — receive refresher training [frequency]. The gifts and hospitality register is reviewed by [name/role] every [period].

This policy and the bribery risk assessment behind it are reviewed [frequency, e.g. annually] and when we enter new markets or sales channels. Owner: [name/role]. Next review due: [date].

How to use this template

1. Set the gifts and hospitality declaration threshold to a figure that fits your sector — set it low enough to catch patterns, high enough that nobody declares a coffee.
2. Create the register the same day you adopt the policy; an empty register with a start date is evidence, a policy without one is a claim.
3. List your actual red-flag scenarios — the ones your sales, purchasing, and delivery people genuinely meet — and train with those.
4. Do a one-page bribery risk assessment (markets, intermediaries, public contracts) so the policy is visibly proportionate to your risks.
5. Put the anti-bribery commitment into your standard terms with agents and key suppliers, since their conduct can create liability for you.

Official guidance

- › [GOV.UK — Anti-bribery policy guidance for businesses](#)
- › [GOV.UK — Bribery Act 2010 guidance](#)

This template is provided in good faith and for general information — it is not legal advice. Adapt it to your organisation and, where your sector carries specific legal requirements, have the finished document reviewed by a qualified adviser. The live version at <https://trainedteam.com/templates/anti-bribery-policy> is kept current; this file is a snapshot.