

Anti-Bribery and Corruption Policy

1. Purpose

This policy sets out **[Company Name]**'s commitment to prevent bribery and corruption in all business dealings and to uphold all laws relevant to countering bribery and corruption in every jurisdiction in which we operate.

2. Scope

This policy applies to all employees, officers, directors, contractors, consultants, and business partners globally.

3. Policy Statement

[Company Name] strictly prohibits offering, giving, soliciting, or receiving any form of bribe or corrupt inducement, whether directly or through third parties. All staff must comply with applicable anti-bribery and anti-corruption laws in jurisdictions where we operate.

4. Gifts and Hospitality

Gifts or hospitality must never be offered or accepted with the intention to influence business decisions. All gifts and hospitality must be appropriately recorded and must not be excessive in value.

5. Facilitation Payments

Facilitation payments of any kind are prohibited, regardless of local customs or practices.

6. Responsibilities

- All staff are responsible for reading and understanding this policy.
- Suspected violations must be reported immediately via designated reporting channels.
- Managers are required to ensure that staff receive regular anti-bribery training.

7. Record Keeping

Accurate records must be maintained for all business transactions, hospitality, and gifts to demonstrate transparency and compliance.

8. Breaches of Policy

Breaches of this policy may result in disciplinary action, including dismissal or termination of contract, and could lead to criminal prosecution.

Important Notes

- Policies should be regularly reviewed and updated as laws change.
- Training and awareness are essential for effective implementation.
- Clear reporting mechanisms and whistleblower protections must be in place.
- Documentation and record keeping are key for compliance and defense.
- Adapt and localize to comply with specific country or sector regulations.