



Anti-Bribery & Corruption

A practical introduction to the UK Bribery Act and staying on the right side of it. One-page summary.

The 10 things to remember

- 1 Bribery is offering or accepting any advantage to induce improper performance; it is never limited to cash.
- 2 The offence is complete at the offer or promise; the bribe need not be paid or accepted.
- 3 Facilitation payments are illegal under UK law, whatever the size or the local custom.
- 4 The only defence to the corporate offence is adequate procedures; your compliance is part of that defence.
- 5 Judge gifts and hospitality on proportionality, timing, and transparency.
- 6 Never accept cash or cash equivalents, and decline anything offered around a live decision.
- 7 Record gifts, hospitality, and refusals in the register promptly.
- 8 Declare conflicts of interest as soon as you become aware of them; hiding one is the misconduct.
- 9 Treat unusual commissions, vague invoices, and odd payment routes as red flags: pause and escalate.
- 10 If offered a bribe, refuse clearly, report it promptly, and write down what happened.