

Anti Bribery Policy Template

A free, adaptable template covering prohibited conduct, gifts and hospitality, facilitation payments, third-party due diligence, records, training, and reporting. Includes a gift register, a partner questionnaire, and the evidence buyers and auditors sample.

HOW TO USE THIS TEMPLATE

Replace every [bracketed value] with your own. Delete any section that does not apply, keep the numbering, and route the final version through your normal approval process, including review by counsel. The gift values are adjustable examples, not legal thresholds: the FCPA sets no minimum value for a corrupt gift, and no security framework names a specific limit. Write rules you can show evidence for.

Company: [Company name]

Policy owner: [Compliance Owner, e.g. CEO]

Version: [1.0]

Effective date: [Date]

Approved by: [Name, title]

Next review: [Date, at least annually]

1. Purpose and zero-tolerance statement

Purpose. This policy sets out how [Company] prevents bribery and corruption, so that its business is won and kept on merit, its records are accurate, and everyone acting for it knows what to do when asked for something improper.

Zero tolerance. [Company] prohibits bribery and corruption in every form, in every country where it does business. Personnel and anyone acting on [Company]'s behalf must not offer, promise, give, request, or accept anything of value to improperly influence a decision or to gain an improper advantage, whether directly or through a third party. This applies to public officials and private-sector counterparties alike.

Related policies. Code of Conduct Policy, Whistleblower Policy, Third-Party Risk Management Policy, Vendor Management Policy, Incident Management Policy, Security Awareness Training Policy.

2. Scope and roles

This policy applies to all employees, officers, board members, contractors, interns, and advisors, and to every agent, distributor, reseller, and consultant who acts for [Company] or seeks business on its behalf.

Role	Responsibility
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Leadership [CEO / Board]	Approves this policy, states publicly that bribery is never acceptable, and receives an annual summary of reports and exceptions
Compliance owner [Role]	Owns this policy, approves exceptions and higher-value gifts, runs third-party due diligence, keeps the registers, and investigates reports
Managers	Approve mid-value gifts and hospitality for their teams and escalate anything doubtful
Everyone	Follows the policy, completes training, records gifts, and reports concerns

3. Prohibited conduct

- Offering or paying anything of value to influence a decision, win or keep business, or gain an improper advantage
- Requesting or accepting a kickback, commission, or favor in return for a purchasing, hiring, or contracting decision
- Paying through a third party anything [Company] could not pay directly
- Making facilitation payments (see section 5)
- Making political or charitable donations to obtain an advantage
- Recording any of the above as something else, or keeping any off-book account

4. Gifts and hospitality

Gifts and hospitality may be given or accepted only if they are **open, recorded, modest, lawful**, and not given while a decision involving the recipient is pending.

Tier	Example value	Requirement
Tier 1: Courtesy	Under [\$50]	Allowed if no decision is pending with the recipient. Log it in the register.
Tier 2: Business hospitality	[\$50] to [\$250]	Manager pre-approval, then log it. Annual cap per recipient: [\$250].
Tier 3: Significant	Over [\$250]	Written pre-approval from the compliance owner. The default answer is no.
Public officials	Any value	Written pre-approval from the compliance owner before anything is offered. Usually refuse.

Red lines, regardless of value:

- Cash or cash equivalents, including gift cards and vouchers
- Anything during an active tender, renewal, or contract negotiation with the recipient
- Anything to a public official without written approval

- Anything hidden from the recipient's employer or from [Company]'s own books

TEN-SECOND TEST

Would I be comfortable if this appeared in the recipient's employer's records? Is a decision pending with this person? Would it still be fine at twice the value? One "no" or "not sure" means ask the compliance owner first.

5. Facilitation payments

Facilitation payments (small payments to speed up routine government action) are prohibited. The only exception is a payment made to protect a person from an imminent threat to life, limb, or liberty. Anyone who makes such a payment must report it to [Compliance Owner] on the same business day, and [Company] will record it accurately in its books. The UK Bribery Act has no facilitation payment exemption, and the US FCPA exception is narrow and does not cover decisions to award business, so this policy bans the practice outright.

6. Third parties and intermediaries

Before engaging any agent, distributor, reseller, or consultant who acts for [Company] or seeks business on its behalf, personnel must complete the following. The depth of each step scales with the partner's risk tier.

1. **Tier the risk.** Low: domestic reseller, no government customers. Medium: international reseller, no government interaction. High: agent in a high-corruption country, any partner who deals with public officials, or any intermediary paid on commission.
2. **Questionnaire.** Collect ownership, services, relationships with public officials, and past investigations (Appendix B).
3. **Ownership and public-official check.** Confirm who owns and directs the partner, and whether any of them is a public official or related to one.
4. **Contract terms.** An anti-bribery warranty, a right to audit, and a right to terminate immediately for breach.
5. **Payment rules.** Pay only against a written invoice for defined services, to an account in the partner's own name and country. No cash, no unrelated third-party accounts.
6. **Refresh.** Repeat annually and whenever the relationship changes.

Red flags that require escalation to the compliance owner

Red flag	Action
Excessive commissions or unusually large discounts	Ask for the pricing basis in writing
A consulting agreement with only vaguely described services	Define deliverables or do not sign
The partner works in an unrelated line of business	Ask why it was chosen
The partner is related to, or was suggested by, a public official	Escalate before any contract
A shell company, an offshore entity, or a request to pay an offshore account	Refuse unless the explanation is documented and approved
Refusal to sign anti-bribery terms or audit rights	Treat as a decision to walk away

7. Books and records

All payments, gifts, and hospitality must be recorded accurately and completely in [Company]'s books. No off-book accounts, false descriptions, or altered invoices. Expense reports must describe the real purpose of each item.

8. Training and acknowledgment

- All personnel: training within [30 days] of joining and annually after that, and a signed acknowledgment of this policy
- Sales, partnerships, and finance: additional scenario training annually
- Agents and resellers: a briefing or signed acknowledgment before work starts
- Records: a completion log with name, date, and course version

9. Reporting, investigation, and enforcement

- **Channels.** Report suspected violations to [Compliance Owner] or through [backup channel / anonymous option].
- **Acknowledgment.** [Company] acknowledges every report within [3 business days].
- **Non-retaliation.** [Company] will not retaliate against anyone who reports in good faith. Retaliation is itself a violation of this policy.
- **Investigation.** [Compliance Owner] investigates, with an outside reviewer when a senior person is involved. Every report and outcome is recorded.
- **Enforcement.** Violations lead to discipline up to termination, and termination of contracts with third parties.

10. Review

[Compliance Owner] reviews this policy at least annually and after any report that exposes a gap. Leadership re-approves it each year.

Appendix A: Gift and hospitality register

Date	Given / received	Person and employer	Description and value	Business reason	Approved by	Decision pending?

Appendix B: Third-party questionnaire (starter)

1. Legal name, country of incorporation, and owners with 10% or more.
2. Directors and officers, and whether any is, or is related to, a public official.
3. The services you will perform for [Company], and how you will be paid.
4. Whether you have an anti-bribery policy and training program.
5. Any investigations, charges, or convictions for bribery, corruption, or fraud in the last [5] years.
6. Whether you will interact with public officials on [Company]'s behalf.
7. Confirmation that you will accept anti-bribery, audit, and termination terms in the contract.

Appendix C: Evidence checklist

Evidence		What it proves
☐	Signed, dated policy	The rule exists and leadership approved it
☐	Employee acknowledgments	People were told
☐	Training log	People were trained
☐	Gift and hospitality register	The gift rules are used
☐	Partner due diligence files	Intermediaries were vetted
☐	Contract clauses	Third parties are bound
☐	Report log	The channel works

Framework and law notes

Framework or law	How this policy supports it
SOC 2	Supports CC1.1 (integrity and ethical values). No criterion names bribery; the code of conduct and signed acknowledgments are the usual evidence, and this policy strengthens it.
ISO 27001	No anti-bribery control. Not applicable.
ISO 37001:2025	The certifiable anti-bribery standard. This template covers the same building blocks in a lighter form.
US FCPA	Anti-bribery provisions apply to US companies of any size. Accounting provisions apply to SEC issuers. Gifts, third parties, and records are the areas regulators weigh.
UK Bribery Act 2010	Section 7: adequate procedures are a defence. The six Ministry of Justice principles map to sections 1 to 10 of this policy.
SOX	Accurate books and internal controls (section 7).

Free template from ComplyJet. This is a starting point, not legal advice: have counsel review the final policy, especially if you sell to governments, operate in the UK, or use agents overseas. Read the full guide at complyjet.com/blog/anti-bribery-policy-template.