# Key Considerations for Anti-Bribery and Corruption Compliance

Reviewing how bribery risks arise within your organisation can help identify whether your policies, training and reporting processes remain effective.

**Your Risk Profile**
Consider the markets, services and commercial relationships that may expose your organisation to bribery risks. Procedures should be proportionate to the nature, scale and complexity of the business.

**The Alternative Process**
Consider what would happen if settlement cannot be agreed. Employers should understand the disciplinary, capability, redundancy or other procedure that may otherwise need to continue.

**Senior Leadership Commitment**
Ensure directors and senior managers clearly support and follow the organisation's anti-bribery standards. Employees are more likely to take policies seriously when ethical conduct is demonstrated at leadership level.

**Written Policies**
Check that your anti-bribery, gifts and hospitality, expenses and whistleblowing policies are clear and up to date. The documents should explain prohibited conduct and how concerns must be reported.

**Gifts and Hospitality**
Establish appropriate approval and recording procedures for gifts, hospitality, donations and promotional expenditure. Policies should help employees distinguish legitimate business activity from conduct that could create an improper influence.

## Employee Training

Consider which employees are most likely to encounter bribery risks and what training they require. Training should be practical, relevant to the employee's role and refreshed periodically.

## Third-Party Relationships

Identify employees who appoint or manage agents, consultants, introducers and other intermediaries. Appropriate due diligence and contractual controls can help manage risks arising through people acting on the organisation's behalf.

## Business Protection

Review existing restrictive covenants, confidentiality obligations and intellectual property provisions. The settlement agreement may reaffirm or amend these protections as part of the employee's exit.

## Reporting Concerns

Provide a safe and clearly communicated process for employees to raise concerns. Reports should be handled promptly, sensitively and without subjecting whistleblowers to detrimental treatment.

## Internal Investigations

Establish who will investigate allegations and how independence and confidentiality will be maintained. A clear investigation plan can help preserve evidence and ensure that decisions are based on established facts.

## Monitoring and Review

Review policies and procedures following incidents, organisational changes or entry into new markets. Regular monitoring can help identify whether anti-bribery measures are being followed in practice.

**Chester Office**
Knights Court
1 Weaver Street
Chester, Cheshire
CH1 2BQ
01244 354 800


**Liverpool Office**
3rd Floor
No. 4 St Paul's Square
Liverpool
L3 9SJ
0151 321 0000

Return to the DTM Legal website - ***www.dtmlegal.com***