

# The Six Principles of Anti-Bribery for Business



The Government considers that procedures put in place by commercial organisations wishing to prevent bribery from being committed on their behalf should be based on the following six principles:

## **Principle 1 - Proportionate Procedures**



A commercial organisation's procedures to prevent bribery by persons associated with it are proportionate to the bribery risks it faces and the nature, scale, and complexity of its activities.

They are also clear, practical, accessible, effectively implemented and enforced.

## **Principle 4 - Due Diligence**

Commercial organisations should apply due diligence procedures, taking a proportionate and risk-based approach, regarding persons who perform or will perform services for or on behalf of the organisation to mitigate identified bribery risks.

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### Principle 2 - Top Level Commitment

The top-level management of a commercial organisation (be it a board of directors or the owners) must be committed to preventing bribery.

The organisation should have a culture where bribery is never acceptable.

#### **Principle 3 - Risk Assessment**

Commercial organisations should assess the nature and extent of their exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment should be periodic, informed and documented.

### **Principle 5 - Communication & Training**

Commercial organisations should seek to ensure that their bribery prevention policies and procedures are embedded and understood throughout the organisation through internal and external communication, including training that is proportionate to the risks it faces.

#### Principle 6 - Monitoring & Review

Commercial organisations should monitor and review procedures designed to prevent bribery by persons associated with it and, where necessary, make improvements.