

Anti-Bribery and Corruption Policy

Compliance Policy | Global

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Replace all references to “the Company” with your organisation’s name.

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Contents

1. Purpose
 2. Scope
 3. Definitions
 4. Regulatory Framework
 5. Policy Statement and Principles
 6. Bribery Offences and Failure-to-Prevent Regimes
 7. Prohibited Conduct and Facilitation Payments
 8. Bribery Risk Assessment and Red Flags
 9. Third-Party and Intermediary Due Diligence
 10. Gifts, Hospitality, Donations and Public Officials
 11. Books, Records and Internal Accounting Controls
 12. Roles and Responsibilities
 13. Reporting, Investigation and Self-Reporting
 14. Breaches of this Policy
 15. Training and Awareness
 16. Review of this Policy
- Appendix A: Bribery and Corruption Red-Flag Reference
- Appendix B: Third-Party Anti-Bribery Due Diligence Checklist
- Policy Administration

1. Purpose

This Policy sets out the Company's requirements for preventing, detecting and responding to bribery and corruption in any form, whether involving public officials or private-sector counterparties, in any jurisdiction, and whether committed directly or through intermediaries. The Company has zero tolerance for bribery and corruption: no business objective, commercial target or customer relationship ever justifies conduct prohibited by this Policy.

Bribery and corruption are criminal offences in virtually every jurisdiction, and several national regimes apply extraterritorially to conduct occurring anywhere in the world. A number of jurisdictions also impose corporate liability on companies that fail to prevent bribery by their associates, subject to a defence of adequate or reasonable prevention procedures. This Policy, together with the supporting procedures it mandates, constitutes the core of the Company's anti-bribery management system, structured against ISO 37001 and the OECD Anti-Bribery Recommendation, and is designed to satisfy the adequate-procedures standard and to protect the Company, its directors and its staff from criminal, civil, regulatory and reputational harm.

This Policy has been approved by the Board of Directors and is owned by the Chief Compliance Officer, who is responsible for its implementation, interpretation and annual review.

2. Scope

This Policy applies to the Company and all of its subsidiaries and controlled entities, and to every director, officer, employee, secondee, contractor and volunteer of those entities, in every jurisdiction in which the Company operates or has dealings. It applies to all business lines, products, channels and support functions without exception.

The Policy also applies, through contractual and due diligence mechanisms, to third parties acting for or on behalf of the Company, including agents, introducers, brokers, consultants, lobbyists, outsourced service providers and joint-venture participants. Business units must not engage a third party to do anything that this Policy prohibits the Company from doing itself.

This Policy operates alongside, and does not replace, the Company's Code of Conduct, Conflicts of Interest Policy, Fraud Risk Management Policy, Whistleblower Protection Policy, Gifts and Hospitality Policy and AML/CFT Program. It also operates alongside the Company's third-party risk management policy, which is a separate document outside this policy set that the Company must produce and maintain. Where another document imposes a stricter requirement, the stricter requirement applies.

Jurisdictional application. This Policy states international best practice drawn from the frameworks listed in the Regulatory Framework section. The Company must map the requirements of this Policy to the law of each jurisdiction in which it operates, including local bribery offences, disclosure rules for political and

charitable contributions, and whistleblower protection law, and where local law imposes a stricter requirement than this Policy, local law prevails.

3. Definitions

Term	Definition
Bribery	Offering, promising, giving, requesting, agreeing to receive or accepting a benefit (financial or non-financial) with the intention of improperly influencing a person in the performance of their duties, or as a reward for such influence, whether directly or through an intermediary.
Corruption	The misuse or abuse of entrusted power, position, trust or information for private gain or advantage, whether for the person concerned or another party, including bribery, kickbacks, collusive tendering, improper conflicts of interest and conduct that confers an improper advantage on, or disadvantages, another person or entity.
Benefit	Any advantage of any kind, whether monetary or non-monetary, including cash, gifts, hospitality, entertainment, travel, employment or internship offers, loans, donations, sponsorships, favours, information, and personal or business advantages. A benefit need not be given directly to the person being influenced.
Facilitation Payment	A minor, unofficial payment made to a public official to secure or expedite a routine governmental action to which the payer is already entitled. Facilitation payments are prohibited by the Company in all circumstances, consistent with ISO 37001 and the OECD Anti-Bribery Recommendation, even where local law provides an exception or defence.
Public Official	Any person holding a legislative, administrative or judicial position, whether appointed or elected; any employee, officer, agent or contractor of a government, government agency, regulator, central bank, state-owned or state-controlled enterprise or public international organisation; any official of a political party; and any candidate for public office, in any jurisdiction.
Foreign Public Official	A Public Official of a jurisdiction other than the one in which the relevant conduct

	occurs or in which the relevant Company entity is established, consistent with the definition used in the OECD Anti-Bribery Convention, including employees of foreign state-owned or state-controlled enterprises and officials of public international organisations.
Associate	A person or entity that performs services for or on behalf of the Company, including officers, employees, agents, contractors, subsidiaries, joint-venture participants, intermediaries and other third-party service providers, whose conduct may expose the Company to liability under a failure-to-prevent offence.
Intermediary	A third party engaged to act on the Company's behalf in dealings with customers, counterparties or public officials, including agents, introducers, brokers, referrers, lobbyists, consultants, customs or licensing agents, and joint-venture partners.
Failure-to-Prevent Offence	A corporate criminal offence, enacted in a number of jurisdictions, under which a company is liable for bribery committed for its benefit by an associate unless the company proves it had adequate (or reasonable) procedures in place designed to prevent that conduct.
Adequate Procedures	Proportionate, risk-based anti-bribery controls of the kind contemplated by the defences to failure-to-prevent offences and by ISO 37001, including top-level commitment, risk assessment, due diligence, financial and non-financial controls, training, reporting channels and monitoring.
Secret Commission	A benefit given to or received by an agent, employee or fiduciary without the knowledge and informed consent of their principal, as an inducement or reward in connection with the principal's business. Secret commissions, including kickbacks and undisclosed referral fees, are a form of private-sector bribery.
Gifts and Hospitality	Any gift, meal, entertainment, event ticket, travel, accommodation or other courtesy given to or received from an external party in connection with the Company's business, whether or not a business purpose is present.

Politically Exposed Person (PEP)	An individual who is or has been entrusted with a prominent public function, whether domestically, in a foreign country or by an international organisation, together with that individual's immediate family members and close associates, classified as domestic, foreign or international organisation PEPs consistent with the FATF standards.
Red Flag	A fact, pattern or circumstance that indicates an elevated risk that bribery or corruption may be occurring or being solicited, and that requires escalation and resolution before the relevant activity proceeds.
Gifts and Hospitality Register	The central electronic register maintained by the Compliance function recording all declarable gifts, hospitality, donations and sponsorships given or received, together with their value, the counterparty, the approver, the rationale and all approval decisions.
Self-Reporting	The voluntary disclosure by the Company of suspected criminal conduct to a law enforcement agency, anti-corruption authority or regulator in a relevant jurisdiction, made in accordance with legal advice and any applicable self-reporting or cooperation frameworks.

4. Regulatory Framework

The key legislation, regulations and standards relevant to this document include (as amended from time to time):

Instrument / Standard	Relevance
United Nations Convention against Corruption (UNCAC, 2003)	The near-universal international treaty requiring states to criminalise bribery, embezzlement and related conduct; the benchmark for the prohibitions and preventive measures this Policy implements.
OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997) and the 2021 OECD Anti-Bribery Recommendation	Drives the foreign bribery offences and corporate compliance expectations, including internal controls, ethics and compliance programmes, that this Policy is designed to satisfy.
ISO 37001:2016 Anti-Bribery Management Systems	The international standard against which the Company's anti-bribery control

End of preview

This is a preview extract. The complete document continues beyond the pages shown here.

The full document is supplied as a single, fully editable Microsoft Word (.docx) file immediately after purchase — including every remaining section, the definitions, the regulatory framework references and all appendices and templates.

Bracketed prompts such as [30 days] mark the points where your own thresholds, committee names and local regulatory references are inserted.

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