Anti-Bribery & Corruption Policy for Darko Developments Ltd

Executive Summary

This document is a comprehensive Anti-Bribery & Corruption Policy for **Darko Developments Ltd** for use in the United Kingdom and, where relevant, in any activity outside the UK that falls within UK jurisdiction. It is designed around the Bribery Act 2010, the Ministry of Justice guidance on "adequate procedures," current GOV.UK anti-corruption and whistleblowing guidance, National Crime Agency reporting and risk indicators, and current public procurement exclusion and debarment guidance. The Bribery Act creates four key offences: bribing another person, being bribed, bribery of a foreign public official, and failure of a commercial organisation to prevent bribery by associated persons. The Act also has extra-territorial reach, and a section 7 defence is available only where the organisation can prove it had adequate procedures designed to prevent bribery.

For a contractor such as Darko Developments, the highest-value control themes are clear top-level commitment, proportionate procedures, risk assessment, due diligence on subcontractors and intermediaries, trusted reporting channels, training, and active monitoring. Official guidance specifically highlights higher bribery risk in public procurement, licences and permits, high-value projects, projects involving multiple contractors or intermediaries, and risky business partnerships such as agents, joint ventures and relationships linked to politically exposed persons.

This policy therefore adopts a **zero-tolerance** position, conservative gifts and hospitality thresholds, a mandatory gifts register, a strict ban on facilitation payments, a prohibition on political donations unless the Board expressly determines otherwise, enhanced due diligence for third parties and joint ventures, protected speak-up arrangements, and documented investigation and remediation procedures. That structure is aligned with official UK guidance that policies should be proportionate, embedded, communicated, risk-based, and reviewed regularly.

Document Control and Company Details

Item	Detail
Company	Darko Developments Ltd
Policy title	Anti-Bribery & Corruption Policy

Item	Detail
Jurisdiction	United Kingdom
Primary legal framework	Bribery Act 2010 and related UK guidance
Website / email domain standard	**www.darkofitouts.com** **info@darkofitouts.com**
Policy owner	Anti-Bribery Compliance Officer
Approved by	Board of Directors
Effective date	29-06-2026
Review cycle	At least annually and after any material incident or major business change
Next review date	29-06-2027
Applies to	Directors, employees, agency workers, labour-only workers, temporary staff, consultants, subcontractors, agents, suppliers, and joint-venture / consortium personnel where acting for or on behalf of the Company

Implementation note. Before issuing this policy externally, Darko should insert the name of the appointed Anti-Bribery Compliance Officer, confirm the active reporting mailbox and phone number on the company's **.com** domain, and populate the approval and review dates. For practicality, this draft uses placeholder internal channels such as **compliance@darkodevelopments.com** and **speakup@darkodevelopments.com**.

Legal and Risk Framework

Under the Bribery Act 2010, a person commits an offence by offering, promising or giving a financial or other advantage to induce improper performance; by requesting, agreeing to receive or accepting such an advantage; or by bribing a foreign public official. A commercial organisation commits a separate offence if an associated person bribes another person intending to obtain or retain business or a business advantage for the organisation. "Associated person" is defined broadly as a person who performs services for or on behalf of the organisation, and can include employees, agents, subsidiaries and, depending on the circumstances, contractors and suppliers. Individuals can face imprisonment of up to 10 years and/or a fine; organisations convicted of bribery or failure to prevent bribery are liable to a fine.

The Ministry of Justice guidance is the core reference point for "adequate procedures." It states that anti-bribery procedures should be proportionate to the organisation's risk and to the nature, scale and complexity of its activities. The guidance is expressly designed for organisations of all sizes, including small and medium-sized businesses, and is built around six principles: proportionate procedures, top-level commitment, risk assessment, due diligence, communication including training, and monitoring and review.

Official guidance also makes clear that genuine, reasonable and proportionate hospitality is not prohibited, but hospitality used as a cover for bribery will engage the Act. Facilitation payments, by contrast, are treated as bribes and are illegal under UK law; the Act provides no exemption for them. GOV.UK and NCA guidance recommend that demands for facilitation payments be documented and reported.

Darko's risk profile should be assessed against the external and internal categories set out in official guidance. External risks include country, sectoral, transaction, business opportunity and business partnership risk. Transaction risks expressly include public procurement, licences and permits, and charitable or political contributions. Business opportunity and partnership risks increase where projects are high value, involve many contractors or intermediaries, or use agents, consortia or joint ventures. Internal risk factors include inadequate training, weak financial controls, unclear rules on hospitality or donations, poor tone from the top and incentive structures that reward excessive risk taking. For Darko's operations, that means particular attention should be paid to tendering, subcontractor chains, supplier onboarding, project variations, permits and inspections, client entertainment, cash handling, community benefit requests, and any relationship that creates influence over contract award, certification, payment or regulatory decisions.

Bribery also has procurement consequences. Current Cabinet Office guidance under the Procurement Act 2023 explains that bribery offences sit within the mandatory exclusion grounds for relevant offences, and that conduct such as failure to prevent bribery may also amount to professional misconduct capable of triggering exclusion or debarment consequences. Contracting authorities must check the debarment list in procurements and must or may exclude listed suppliers depending on the ground involved.

Workers who make qualifying whistleblowing disclosures in the public interest through appropriate channels are protected under UK whistleblowing law from detriment and, for employees, unfair dismissal. Current official guidance also confirms that reports may be made internally or to prescribed persons, and that the Director of the Serious Fraud Office and the National Crime Agency are prescribed bodies for bribery and corruption concerns within their remits.

Full Policy Text Ready for Use

Policy Statement

Darko Developments Ltd is committed to carrying out business **fairly, honestly, openly and lawfully**. The Company has a **zero-tolerance** approach to bribery and corruption in any form. No director, employee, subcontractor, consultant, agent, supplier or joint-venture representative acting for or on behalf of the Company may offer, promise, give, request, accept, authorise, tolerate, conceal or facilitate a bribe. This policy is intended to form part of Darko's "adequate procedures" for the purposes of section 7 of the Bribery Act 2010 and is to be applied proportionately to the Company's risk profile.

Scope

This policy applies to all business activities of Darko Developments Ltd, including estimating, tendering, procurement, contract negotiation, commercial management, site operations, project delivery, aftercare, recruitment, plant and materials purchasing, community engagement, donations, and any dealings with public officials, clients, consultants, subcontractors, suppliers, intermediaries and joint-venture or consortium partners. It applies equally to the offer of improper advantages and to the receipt of them. Because the Bribery Act's "associated person" concept is broad, the Company treats any person performing services for or on its behalf as within scope where the relationship creates bribery risk.

Definitions

For the purposes of this policy, **bribery** means offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage to induce or reward improper performance, and includes the corporate offence of failing to prevent bribery. **Corruption** is treated in this policy as the abuse of entrusted power for private benefit. **Improper performance** means performance that breaches an expectation of good faith, impartiality or trust. **Associated person** has the meaning given by sections 7 and 8 of the Bribery Act 2010. **Facilitation payment** means a payment to secure or speed up routine action by an official. **Public official** for Company purposes includes any person employed by or acting for a government department, local authority, regulator, public body, inspection body, state-owned enterprise, or any person exercising a public function.

Governance and Responsibilities

The **Board of Directors** has overall responsibility for anti-bribery governance. It will approve this policy, set the tone from the top, review bribery risk at least annually, ensure sufficient resources are available, review serious incidents, approve exceptional high-risk decisions, and require periodic reporting on training, gifts and hospitality, due diligence, incidents and remediation. Official guidance places top-level management in the best position to foster a culture in which bribery is never acceptable, and current government standards recommend appointing a specified senior accountable lead and an annual Board or equivalent assessment of programme adequacy.

The **Anti-Bribery Compliance Officer** is responsible for maintaining this policy, advising management, overseeing the risk assessment process, approving or escalating gifts and hospitality in line with the rules below, maintaining the gifts register and incident log, overseeing third-party due diligence, arranging training, coordinating investigations, tracking corrective actions, and reporting at least annually to the Board. In an SME structure, this role may be combined with another senior management role, but it must have direct access to the Board.

Managers are responsible for embedding the policy in their teams and projects, challenging unusual behaviour, refusing improper requests, ensuring that high-risk relationships are escalated early, confirming that project staff complete the required training, and ensuring that site, procurement and commercial records are complete and accurate. **All workers** must comply with this policy, complete training, avoid conflicts of interest, register gifts and hospitality, report concerns promptly, cooperate with investigations, and never assume that "this is how business is done" is an acceptable reason to depart from the policy.

Risk Assessment

Darko will operate a **documented, risk-based bribery and corruption assessment** that is reviewed at least annually and also whenever the Company enters a new market, takes on materially different project work, forms a joint venture, appoints a new high-risk intermediary, experiences an incident, or identifies a significant legal, client or sector change. Official guidance requires risk assessment to be periodic, informed and documented, and identifies oversight by top-level management, appropriate resourcing, use of internal and external information, due diligence enquiries and accurate documentation as core features of an effective process.

Darko's risk assessment will consider, at minimum:

- project type, value and duration
- procurement route and whether public procurement rules apply
- need for permits, licences, inspections, planning, building control or other approvals
- use of subcontractors, consultants, brokers, introducers or labour suppliers
- payment structures, commissions, rebates, discounts, credit notes and urgent cash requests
- hospitality, travel, accommodation and invitation patterns
- charitable, sponsorship or community benefit requests linked to approvals or contracts

- links to public officials or politically exposed persons
- country and sanctions exposure for overseas suppliers or clients
- internal factors such as incentives, segregation of duties, financial controls, training gaps or prior incidents.

These factors reflect the risk categories and internal warning signs set out in Ministry of Justice guidance and current government counter-bribery standards.

The Compliance Officer will maintain a **Bribery Risk Register** and a **Control Improvement Plan**. New procedures or activities must be subject to bribery risk review before implementation. High-risk projects or relationships must not proceed until the required mitigating actions are completed or formally accepted by the Board.

Gifts, Hospitality, Travel and Entertainment

Darko recognises that genuine and proportionate hospitality can be a legitimate part of business. However, there is **no monetary safe harbour** in the law, and hospitality becomes unlawful where it is intended to influence improper performance. Government guidance says limits should be kept to an absolute minimum and that free or discounted travel and accommodation should normally be declined unless they form part of a contractual or joint-venture arrangement. All offers, whether accepted or declined, should be recorded.

Accordingly, Darko applies the following internal rules:

Always prohibited

- cash, cash equivalents, gift cards, vouchers, loans, personal discounts not generally available, kickbacks or rebates to individuals
- anything indecent, illegal or likely to damage the Company's reputation
- gifts or hospitality during a live tender, bid clarification, evaluation, negotiation, pricing exercise, variation approval, certification decision, final account negotiation, dispute, payment release or regulatory inspection
- hospitality for spouses, family members or friends, unless expressly part of a legitimate contractual or corporate event approved under this policy
- any gift, travel or entertainment that a reasonable observer would view as lavish, secretive or intended to create obligation.

Approval thresholds for private-sector relationships

Value / circumstance	Rule	Approval required	Register
Up to £50 per person and infrequent	May be offered or accepted if lawful, transparent, business-related and not otherwise prohibited	Line manager notification	Yes
£51 to £150 per person	Only if justified and proportionate	Prior written line manager approval	Yes
£151 to £300 per person	Exceptional only	Prior written Compliance Officer approval	Yes
Over £300 per person, or any travel / accommodation / event tickets	Generally prohibited unless a clear written business case exists	Prior joint approval of Managing Director and Compliance Officer	Yes

Public officials Any gift or hospitality involving a public official must be treated as **high risk**. Only modest working refreshments or low-value promotional items may be considered, and every case must be pre-approved in writing by the Compliance Officer and recorded in the register. Any travel or accommodation for a public official requires Managing Director approval, a clear written business rationale, confirmation of legality, and confirmation that the official's own rules permit it.

Register rules Darko will maintain a **Gift, Hospitality and Entertainment Register** that is accessible, durable, mandatory and auditable. Entries must be made at the time of the offer or as soon as reasonably practicable, and always within **five working days**. The register must record the date, time, parties, organisation, description, value, relevant project or tender, whether the offer was accepted or declined, the approver, and any follow-up action.

Facilitation Payments

Darko prohibits **all facilitation payments**. Staff must not make or authorise a payment to secure or accelerate a routine action, whether described as a facilitation fee, inspection fee, expediting fee, service charge, token, courtesy payment or any similar term. Official UK guidance is clear that facilitation payments are regarded as bribes and are illegal.

If a facilitation payment is demanded, the person involved must, where safe to do so, refuse the demand, ask for the legal basis of the charge, request an official receipt, and immediately report the incident to the Compliance Officer. If there is an immediate threat to life, liberty or personal safety, safety comes first; any payment made in those circumstances must be reported **immediately**, fully documented, and escalated to the Board for legal advice and any appropriate authority notification. All demands must be entered in the incident log.

Political Donations

Darko does **not** make political donations or incur political expenditure on behalf of the Company unless the Board expressly determines otherwise after obtaining legal advice. Any permitted exception would require:

- advance Board approval recorded in minutes
- verification that the payment is lawful and not connected to an attempt to influence a contract, permit, inspection or decision
- completion of a conflict and reputation assessment
- accurate accounting and disclosure
- any shareholder approval required by law before payment is made.

This is a deliberately stricter internal rule than the minimum legal position.

Charitable Donations, Sponsorship and Community Benefits

Charitable giving, sponsorship or community support may be legitimate, but official guidance identifies charitable and political contributions as transaction risks and highlights the bribery danger where an official suggests a donation that will be a “positive factor” in a licensing or contract decision. Darko therefore permits only **bona fide, transparent and documented** charitable or community support that is not linked to obtaining or retaining business or influencing a public or private decision maker.

Before any donation, sponsorship or community benefit commitment is approved, Darko must confirm:

- the legitimate purpose of the payment
- the legal status, reputation and bank details of the recipient
- whether any public official, client representative or employee has a personal connection to the recipient
- whether the request coincides with a procurement, licence, permit, inspection or certification process
- how the funds will be applied and monitored.

Any donation or sponsorship linked to a tender, licence, permit, inspection or planning/building control decision is prohibited unless the Board, after legal review, is satisfied it is lawful, independently justified and fully separable from any decision.

Third-Party Due Diligence and Contracting

Because contractors, consultants, agents and some suppliers can be "associated persons" under section 7, Darko will conduct **risk-based due diligence** before entering into or renewing relationships with third parties that perform services for or on behalf of the Company. Ministry of Justice guidance stresses that due diligence should be proportionate to the risk, and official case studies recommend questionnaires, ownership checks, references, internet research, clarity on services and remuneration, review of the other party's anti-bribery arrangements, and periodic renewal of checks.

Darko's minimum onboarding checks for material subcontractors, consultants, labour suppliers, agents and joint-venture partners are:

- identity, legal status and ownership confirmation
- Companies House search, filing history and officer review where relevant
- check of the disqualified directors register
- sanctions screening against the **current UK Sanctions List**
- confirmation of technical capability, references and commercial rationale
- adverse media / open-source review proportionate to risk
- review of anti-bribery, whistleblowing and gifts / hospitality policies where available
- confirmation of any links to public officials or politically exposed persons
- review of pricing, commissions, rebates and payment routes for anomalies
- confirmation that bank accounts are in the contracting party's name and in a relevant jurisdiction.

Enhanced due diligence is mandatory if there are red flags such as unusual secrecy, shell-company use, vague documentation, inflated invoices, requests for cash or payment to unrelated accounts, unexplained third-party intermediaries, additional unexplained fees, lack of capability, or excessive gifts, travel or hospitality involving public officials or politically exposed persons. Those indicators appear in current NCA foreign bribery guidance.

All higher-risk third-party contracts must include anti-bribery clauses requiring, at minimum:

- compliance with all applicable anti-bribery laws
- no bribes, kickbacks or facilitation payments
- accurate books and records
- prompt reporting of any bribery request or suspicion
- access for Darko to relevant records and reasonable audit rights
- cooperation with investigations
- termination, suspension or removal rights if credible bribery concerns arise.

This approach is consistent with official case studies on agents and joint ventures, which expressly refer to contractual anti-bribery commitments, audit rights, reporting duties and termination rights.

Joint Ventures and Consortiums

Before entering a joint venture, consortium or strategic alliance, Darko will conduct enhanced due diligence on the proposed partner, document the business rationale, assess governance rights, and seek contractual commitments to comply with anti-bribery laws. Where warranted, the agreement should include representation on the governing body, approval controls for significant expenditure, review rights over accounts, incident reporting obligations, and termination or equivalent consequences for material breaches. Official Ministry of Justice case studies recommend precisely these types of measures for joint ventures where interaction with public officials presents bribery risk.

Reporting and Whistleblowing

Anyone covered by this policy who knows of, suspects, or is asked to participate in bribery or corruption must report it **promptly**. Reports may be made to:

- the line manager
- the Anti-Bribery Compliance Officer
- the Managing Director
- the Board Chair, where senior management may be implicated.

Darko will make the speak-up process accessible to workers and relevant third parties. Official guidance states that organisations should have accessible speak-up processes and central contact points for bribery concerns, and that workers making qualifying disclosures in the public interest are protected by law from detriment and dismissal.

Reports may be made openly or, where appropriate, anonymously. Darko will keep disclosures confidential as far as reasonably possible, will not retaliate against anyone who raises a concern in good faith, and will not use confidentiality clauses to prevent protected whistleblowing disclosures. Current GOV.UK guidance says confidentiality is best practice and that "gagging clauses" cannot prevent protected disclosures.

Where appropriate, external reporting may also be made to current official reporting channels, including the Serious Fraud Office or the National Crime Agency, both of which are prescribed bodies for relevant bribery and corruption matters within their remits.

Investigation Process

All reported concerns will be handled promptly and fairly. Darko will normally follow this process:

1. **Triage and safeguarding.** Confirm any immediate safety, legal or reputational risk.
2. **Preservation.** Secure documents, emails, phones, site records, payment data and access logs.
3. **Conflict check.** Appoint an investigator with suitable independence.
4. **Initial assessment.** Decide whether the matter appears minor, serious, systemic or potentially criminal.
5. **Investigation.** Interview relevant persons, review records and test controls.
6. **Action.** Decide disciplinary, contractual, civil, insurance, regulatory or criminal referral steps.
7. **Close-out.** Record findings, lessons learned and control improvements.

Current official UK standards recommend a detailed response plan, regular incident recording, and the ability to pursue parallel routes, including criminal, disciplinary, civil and regulatory action where appropriate.

If the investigation suggests potential criminal conduct, the Board will obtain legal advice without delay and consider whether self-reporting or cooperation with law enforcement is appropriate. Current SFO guidance states that a prompt self-report and full cooperation are strong factors in favour of Deferred Prosecution Agreement negotiations rather than prosecution, absent exceptional circumstances.

Disciplinary Measures, Sanctions and Remediation

Any breach of this policy may lead to disciplinary action up to and including summary dismissal for gross misconduct, termination of contract, recovery of losses, withholding of sums where lawful, removal from approved supplier lists, and referral to law enforcement or other authorities. Darko may also require retraining, enhanced supervision, replacement of project personnel, revised approval controls, intensified auditing, or broader remediation of the relevant business area. Official sources make clear that bribery offences carry serious criminal penalties and may also create procurement exclusion or debarment consequences.

Training, Communication, Monitoring, Review and Record Keeping

Darko will communicate this policy internally and externally in accessible form and will provide:

- induction training for all new starters
- annual refresher training for all employees
- enhanced role-based training for directors, procurement staff, estimators, commercial managers, project managers, site managers, finance staff and anyone dealing with public officials or high-risk third parties
- targeted briefings for major projects and joint ventures
- communication of relevant rules to subcontractors, agents and suppliers.

Official guidance requires communication and training that is proportionate to risk and recommends that all staff receive awareness training tailored to role and risk level.

Darko will monitor the effectiveness of this policy through management review, project spot checks, register audits, due diligence quality reviews, and incident trend analysis. At minimum, the Board should review annually:

- completion rate for training
- number and quality of third-party due diligence files
- number and value of gifts / hospitality entries
- facilitation payment demands or other incidents
- investigation outcomes and remediation completion
- policy exceptions granted
- lessons learned and policy changes.

Official guidance states that anti-bribery procedures should be monitored and reviewed regularly and improved where necessary.

Darko will keep accurate and secure records of approvals, due diligence, gifts and hospitality, incidents, investigations, donations, training and attestations. Consistent with government professional standards, the gifts register should be mandatory and durable, and a six-year retention period is recommended for related records. Darko also requires annual staff attestation confirming knowledge of, and compliance with, this policy.

Approval and sign-off

Approved by: ________________________
Name / role: ________________________
Date: ______________________________

One-Page Summary for Staff

Darko has zero tolerance for bribery and corruption. You must never offer, promise, give, request, accept or conceal a bribe. That includes kickbacks, “thank you” payments, personal rebates, secret commissions, and payments routed through someone else. The Bribery Act 2010 covers both offering and receiving bribes, bribery of foreign public officials, and failure by a company to prevent bribery by associated persons.

Register all gifts and hospitality. Genuine, reasonable and proportionate hospitality can be lawful, but there is no legal cash threshold that makes a gift automatically safe. Darko’s internal thresholds are deliberately conservative. Record **all** offers, whether accepted or declined, and obtain approval before accepting or offering anything above the stated limits, or anything involving a public official.

Facilitation payments are banned. If someone asks for a payment to “speed things up,” refuse if safe, ask for the legal basis and receipt, and report it straight away. UK guidance says facilitation payments are bribes and are illegal.

Be careful with subcontractors, consultants and agents. If someone is acting for Darko, their conduct can create risk for the Company. Do not appoint or instruct a third party until the required due diligence is complete and the contract includes anti-bribery terms.

Speak up early. Report any concern to your manager, the Compliance Officer, the Managing Director or the confidential speak-up channel. If you raise a qualifying concern in the public interest through the proper channels, UK whistleblowing law protects you from detriment and unfair dismissal.

Consequences are serious. Internal consequences can include dismissal or termination of contract. Legal consequences can include fines, imprisonment for individuals, serious reputational damage, exclusion from public procurement and other enforcement action.

Editable Templates

Gifts, Hospitality and Entertainment Register

Entry ID	**Date / time of offer**	**Offered by / received from**	**Organisation**	**Offered to / received by**	**Description**	**Estimated value per person**	**Accepted or declined**	**Business purpose**

Third-Party Due Diligence Checklist

Check	**Low**	**Medium**	**High**	**Findings / evidence**	**Risk rating**	**Approved by**	**Date**
Legal name confirmed	☐	☐	☐				
Companies House search completed	☐	☐	☐				
Ownership / directors identified	☐	☐	☐				
Disqualified directors check completed	☐	☐	☐				
UK Sanctions List screening completed	☐	☐	☐				
Capability / references verified	☐	☐	☐				
Adverse media / litigation review completed	☐	☐	☐				
Anti-bribery policy / code reviewed	☐	☐	☐				
Links to public officials / PEPs assessed	☐	☐	☐				
Pricing / commissions / payment method reviewed	☐	☐	☐				

Check	Low	Medium	High	Findings / evidence	Risk rating	Approved by	Date
Bank detail verification completed	☐	☐	☐				
Contract anti-bribery clauses included	☐	☐	☐				
Audit / access rights included	☐	☐	☐				
Reporting / termination rights included	☐	☐	☐				
Renewal / monitoring frequency set	☐	☐	☐				

Suggested declaration wording for staff or third parties

I confirm that I have read and understood the Darko Developments Ltd Anti-Bribery & Corruption Policy, will comply with it, have disclosed any relevant conflicts of interest, and am not aware of any undisclosed bribery, corruption, kickback or facilitation payment issue relevant to the services I perform for or on behalf of the Company.

Name: ________________ Signature: ________________ Date: ________________

Incident Report Form

Field	Information
Report reference	
Date and time reported	
Reporter name and role	
Anonymous report	Yes / No
Contact details	
Person(s) / company(ies) involved	
Project / contract / site	

Field	Information
Date(s) of incident / concern	
Description of allegation or concern	
Type of issue	Bribe offered / bribe requested / facilitation demand / kickback / gift-hospitality concern / donation concern / procurement concern / falsified record / other
Any public official involved	Yes / No
Any immediate safety concern	Yes / No
Documents / devices / records preserved	
Witnesses	
Estimated financial exposure	
Immediate actions taken	
Escalated to	
Initial risk rating	Low / Medium / High / Critical
Proposed next steps	
Investigator assigned	
Outcome / corrective action	
Date closed	

Reporting and Investigation Flowchart

Yes

No

Yes

No

Yes

No

Concern, suspicious request or incident identified

Immediate safety risk?

Prioritise safety and seek urgent help

Report promptly to manager, Compliance Officer or speak-up channel

Log report and preserve records

Conflict or senior person implicated?

Escalate to Managing Director / Board Chair

Compliance Officer triage

Potential criminal / serious bribery issue?

Obtain legal advice and consider regulator / law-enforcement referral

Internal investigation

Findings and action plan

Disciplinary / contractual / civil / control actions

Board review, lessons learned, policy update, close-out

Show code

Prioritized Sources

Primary statutory and official sources

Bribery Act 2010 — the core legal source for offences, associated person scope, penalties and jurisdiction. This is the first reference for any policy, training or tender review.

Ministry of Justice guidance on procedures commercial organisations can put in place to prevent bribery — the authoritative UK source on "adequate procedures," including the six principles, risk categories, due diligence expectations, hospitality guidance, joint ventures, agents and charitable donation case studies.

GOV.UK Anti-Bribery Policy page and Counter Bribery & Corruption Professional Standard — useful for translating legal duties into practical controls, including gifts registers, reporting arrangements, due diligence, contract clauses, monitoring and annual review.

Current whistleblowing guidance and prescribed persons list — essential for speak-up arrangements, confidentiality, anti-retaliation language, and external reporting options to the SFO or NCA where appropriate.

NCA bribery and corruption guidance — valuable for business-facing practical guidance on facilitation payments, reporting and red flags, especially for third-party relationships and foreign bribery indicators.

Procurement Act 2023 exclusions and debarment guidance — important for tendering and reputational risk because bribery offences and related misconduct can affect eligibility for public contracts.

Supplementary official and best-practice sources

SFO Cooperation Guidance — relevant if a serious issue is discovered and the Company must consider the legal and strategic implications of self-reporting and cooperation.

Companies House, disqualified directors register and the UK Sanctions List — practical due-diligence tools that should be embedded into onboarding and renewal checks for higher-risk third parties.

Transparency International UK Anti-Bribery Guidance — a useful secondary best-practice resource on managing third parties and gifts / hospitality where Darko wants to benchmark beyond the legal minimum, but it should sit behind the statutory and GOV.UK materials above.