**Anti-Corruption and Bribery Policy**

**Policy Number:** ACBP/2024/009  
**Effective Date:** 2024-01-24

1. Policy Statement:

[Your Company Name] is committed to conducting business ethically and in compliance with all applicable laws and regulations, including those pertaining to anti-corruption and anti-bribery. This Anti-Corruption and Bribery Policy outlines our zero-tolerance approach to corruption and bribery and sets forth the responsibilities of our employees and business partners to uphold integrity in all business dealings.

2. Scope:

This policy applies to all employees, officers, directors, agents, consultants, contractors, and any other persons or entities acting on behalf of [Your Company Name], in every location where we operate.

3. Definitions:

* **Corruption:** The abuse of entrusted power for private gain.
* **Bribery:** Offering, giving, receiving, or soliciting anything of value to influence the actions of an official or other person in charge of a public or legal duty.

4. Policy:

**4.1 Prohibition of Bribery and Corruption:**

* Strictly prohibit any form of bribery, kickbacks, or corruption. This includes direct or indirect offers, payments, solicitations, or acceptance of bribes in any form.
* Ensure that no company funds or assets are used for any unlawful, unethical, or improper purposes.

**4.2 Gifts and Hospitality:**

* Prohibit the acceptance or provision of gifts, hospitality, or expenses whenever such arrangements could affect or appear to affect the integrity of business transactions.
* Any gifts or hospitality given or received must be customary, reasonable, and transparent.

**4.3 Due Diligence:**

* Conduct due diligence on third parties, agents, and business partners to ensure they are committed to ethical business practices and are compliant with this policy.

**4.4 Record-Keeping:**

* Maintain accurate and complete records of all financial transactions and ensure that all expenses and payments are properly documented and justifiable.

**4.5 Training and Communication:**

* Provide regular training to employees on this policy, ensuring they understand their responsibilities and the importance of ethical business conduct.
* Communicate this policy to all business partners, suppliers, and relevant third parties.

**4.6 Reporting Violations:**

* Encourage employees and others to report any suspected or actual instances of bribery, corruption, or any other violations of this policy, without fear of retaliation.
* Establish clear procedures for confidential reporting and investigation of such reports.

**4.7 Enforcement and Discipline:**

* Ensure that any violations of this policy are dealt with promptly and with appropriate disciplinary action, up to and including termination of employment or contracts.

5. Review and Modification:

This policy will be reviewed annually or in response to significant changes in law, market conditions, or company operations. All amendments to this policy must be approved by [Appropriate Authority/Department].