Using the template in Europe or the United States

The template is written for the UK. To use it in the EU or the United States, replace its statements of UK law with your own and check the four things below. Dealings with officials, public tenders and federal contracts have extra rules, listed under special cases.

European Union	What to change	Who to ask
Purpose and status, What bribery is	The law. Bribery is a crime under each country's own law. A new EU anti-corruption Directive came into force in May 2026, with national laws due by June 2028 (Denmark is not bound), so check the current position in yours.	Your legal advisers
Purpose and status	Companies' liability. Each country sets how a company is liable for bribery by its people, and the UK defence of adequate procedures may not apply. Check how your country treats an anti-bribery programme.	Your legal advisers
Gifts and hospitality	Gifts and hospitality. Each country's law sets what counts as an improper gift, and public officials may have their own rules. Check both and set your limits in euro or your own currency.	Your compliance team
Recruitment, finance and conflicts of interest	Records. Keep the template's rules on accurate books and approved payments. Limited companies' annual accounts must also give a true and fair view under your country's accounting law.	Your finance team and auditor
Special cases	If you deal with the EU institutions, their staff need permission to accept a gift. A bidder convicted of corruption by final judgment is generally excluded from public tenders, subject to national rules.	Your legal or regulatory advisers

United States	What to change	Who to ask
Purpose and status, Who and where this policy covers	The law. The Foreign Corrupt Practices Act bans bribing foreign officials (who can include staff of state-owned companies) to obtain or keep business by US companies, SEC-reporting companies and others who further a bribe in the US. Enforcement changed in June 2025, so check the current position.	Your legal advisers
Facilitation payments and payments under threat	Facilitation payments. The FCPA's anti-bribery rules have a narrow exception for payments that only speed up routine government action involving no official discretion; the UK Bribery Act has none. Decide your rule, remembering such payments may break local law.	Your legal advisers
Recruitment, finance and conflicts of interest	Books and records. Companies that report to the SEC must keep accurate books and internal accounting controls. Recording a bribe as something else does not change what it is.	Your finance team and auditor
Facilitation payments and payments under threat	Officials asking for bribes. The Foreign Extortion Prevention Act makes it a US crime for a foreign official to demand a bribe for business from US companies and people, among others. Keep the template's steps for refusing and reporting a request.	Your legal advisers
Special cases	Bribing a federal official is a crime, and federal staff have strict gift limits. Federal contracts above a set value and length require an ethics code and disclosure of contract-related bribery, and some state laws also cover bribery between businesses.	Your legal or regulatory advisers

Sources: the statements above were taken from official pages read on 4 October 2026. The pages are listed at policysight.com/templates/anti-bribery. Version 1.0, next review April 2027.

This guide is a starting point, not legal or regulatory advice, and PolicySight Ltd is not a law firm. It is a list of things to check. It is not complete and law changes. Have your own advisers confirm what applies to you before you rely on it.