Anti-Bribery and Corruption Policy

How [TeamTalk Ltd] prevents bribery by people associated with it, structured against the six principles in the Ministry of Justice statutory guidance.

SCALE NOTE

As at [date] TeamTalk has **one director and no employees**. Where this policy names a second role or a review cycle, it takes effect when that person is engaged. External escalation: [accountant / solicitor, name and telephone].

1. Policy statement

[TeamTalk Ltd] conducts its business honestly and without bribery. It prohibits bribery in every form, in the United Kingdom and anywhere else, whether offered, promised, given, requested, agreed to or accepted, and whether directly or through a third party. There is no threshold below which a bribe is acceptable and no commercial objective that justifies one. **The company would rather lose a contract than win one this way, and any employee who loses business by refusing to pay a bribe will be supported, not criticised.**

Bribery is a criminal offence under sections 1, 2 and 6 of the Bribery Act 2010, carrying up to ten years' imprisonment and an unlimited fine for an individual. Under section 7 a commercial organisation is itself guilty of an offence if a person associated with it bribes another intending to obtain or retain business or a business advantage for it. **Section 7 has no size threshold and applies to this company.** The only defence, in section 7(2), is to prove that the company had in place adequate procedures designed to prevent such conduct. This policy is part of those procedures.

2. Scope

This policy applies to every employee, director, contractor, agent, consultant, introducer, reseller and any other person who performs services for or on behalf of the company, wherever located. It is drawn to their attention before they begin work and compliance with it is a term of every engagement.

3. What is prohibited

- Offering, promising or giving any financial or other advantage to induce or reward the improper performance of a function or activity, or where accepting it would itself be improper.
- Requesting, agreeing to receive or accepting any such advantage.
- Bribing a foreign public official to influence them in their official capacity in order to obtain or retain business or a business advantage.
- **Facilitation payments**, that is small unofficial payments to secure or speed up a routine action. These are bribes under the Act and are prohibited without exception, even where they are locally customary. If a payment is demanded under threat to personal safety, pay it, leave the situation, and report it immediately: personal safety comes first and the company will deal with the consequences.
- Kickbacks, whether paid or received, in any form.
- Using a third party, including an agent or reseller, to do anything this policy prohibits.
- Charitable or political donations made to obtain a business advantage. Political donations are not made at all.

4. Hospitality, gifts and expenses

Reasonable and proportionate hospitality given or received to build a normal business relationship is not prohibited. The test is whether it is **reasonable, proportionate, given openly, properly recorded, and not intended to influence a decision**. Applying that test in practice:

- Gifts and hospitality with a value above [£50] must be approved in advance by [name] and recorded in the gifts and hospitality register.
- Nothing is offered or accepted during a live tender, procurement or contract negotiation.
- Cash and cash equivalents, including gift cards, are never given or accepted.
- Nothing is given to a public official, or to a member of their family, without prior written approval.
- Nothing is offered that would embarrass the company or the recipient if it appeared in a customer's audit or in the press.

5. The six principles, and what the company actually does

Proportionate procedures

This policy, the register, the contract clause and the annual briefing are the whole of the procedure. That is proportionate to a micro business selling software in the United Kingdom, and the company does not pretend to a larger framework it does not operate.

Top-level commitment

[Name, Director] owns this policy, approves every exception, and states the position to staff and to third parties. Bribery is never acceptable and this is said out loud, not left implied.

Risk assessment

Documented annually. Current assessment: **low**. The company sells to private-sector UK organisations, does not operate in high-risk jurisdictions, has no dealings with foreign public officials, and uses no agents or introducers. The areas to watch are hospitality during procurement, any future introducer arrangement, and public-sector tendering if it is ever undertaken.

Due diligence

Before engaging any agent, introducer, reseller or subcontractor, the company checks who owns and controls them, whether their remuneration is proportionate to the service provided, and whether there are adverse findings. A commission structure that cannot be explained is a reason not to proceed.

Communication, including training

Every person engaged reads this policy at induction and confirms annually that they have read it. The anti-bribery clause appears in every customer and supplier contract, and the policy is given to third parties on request.

Monitoring and review

The register is reviewed [twice a year] and this policy annually, or sooner following any concern, any change in the law, or entry into a new market or sector.

6. Raising a concern

Anyone who is offered a bribe, is asked to make one, or suspects that one has occurred must report it immediately to [name, email, mobile], or, if that person is implicated, to [the external escalation route named in the scale note above: the company's accountant or solicitor]. Reports may be made in confidence. **No one will suffer demotion, penalty, loss of work or any other detriment for refusing to pay or accept a bribe, or for reporting a concern in good faith, even if the concern turns out to be mistaken.** Qualifying disclosures are protected under the Public Interest Disclosure Act 1998. The independent charity Protect provides free confidential advice on 020 3117 2520.

A breach of this policy by an employee is treated as gross misconduct and may result in dismissal. A breach by a supplier, agent or contractor is a ground for immediate termination. Where an offence appears to have been committed, the company will report it to the appropriate authority.

Approved on behalf of [TeamTalk Ltd], company number [number], registered office [address].

SIGNATURE	NAME AND POSITION	DATE OF ISSUE	DATE OF NEXT REVIEW

Not legal advice. Section 7 of the Bribery Act 2010 has no turnover or size threshold: it applies to this company in full. Keep the register and the training record, because the section 7(2) defence depends on procedures being real and evidenced, not merely written. **Sources, verified 28 August 2026:** Bribery Act 2010, ss.1, 2, 6 and 7, and in particular the s.7(2) defence of "adequate procedures" legislation.gov.uk/ukpga/2010/23; Ministry of Justice, *The Bribery Act 2010: guidance about procedures which relevant commercial organisations can put into place to prevent persons associated with them from bribing*, issued under s.9 gov.uk/government/publications/bribery-act-2010-guidance.