



Anti-Bribery Toolkit



About

Regulations require you to train your employees to ensure they are aware of bribery risks, relevant legislation, their obligations under the law, the identity of the compliance officer, and their responsibilities related to preventing and reporting bribery incidents.

Widespread failures in meeting anti-bribery obligations have resulted in firms facing significant fines and severe reputational damage, highlighting the importance of strong compliance measures.

This toolkit provides resources to aid your anti-bribery compliance efforts.



Did you know...

In 2024, Gunvor, a Swiss commodities trading company, pled guilty to pay over \$661M for breaching the Foreign Corrupt Practices Act.

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Why Bribery Prevention Matters

Understanding bribery prevention is essential for every organisation. Anti-bribery regulations are not merely a legal obligation; they form a comprehensive framework designed to prevent corruption and protect your organisation from legal and reputational harm. Adhering to these regulations helps mitigate the risks associated with bribery, avoids significant penalties, and upholds your organisation's ethical standards.



By recognising and implementing bribery prevention measures, your organisation can:

- **Prevent Corruption** - Ensure effective measures are in place to detect and combat bribery and corrupt practices.
- **Build Trust** - Strengthen your reputation and foster confidence among clients, partners, and regulators by demonstrating strong anti-bribery compliance.
- **Avoid Legal Penalties** - Prevent severe fines and legal consequences related to non-compliance.
- **Promote Ethical Practices** - Implement robust anti-bribery policies to safeguard your organisation from unethical behaviour.
- **Support Business Integrity** - Conduct operations confidently, knowing you are compliant with anti-bribery regulations and contributing to a fair business environment.

Understanding the importance of bribery prevention enables your organisation to maintain compliance, protect its reputation, and uphold the trust of your stakeholders.

Bribery & corruption

red flags

Identifying potential risks is the first step in prevention.
Common red flags include:

- 1 **Unusual payment structures** - Large or irregular payments, particularly to offshore accounts.
- 2 **Excessive hospitality or gifts** - Lavish or disproportionate gestures designed to influence decisions.
- 3 **Opaque contracts** - Vague agreements lacking clarity on terms or deliverables.
- 4 **Conflict of interest** - Undisclosed personal relationships influencing business dealings.
- 5 **Pressure for quick decisions** - Push to bypass due diligence for immediate approvals.
- 6 **Third-party involvement** - Use of intermediaries to obscure unethical transactions.

FCA Training Aid

Anti-bribery Tips

This guide outlines the examples of good and bad practices for anti-bribery training provided by the Financial Conduct Authority (FCA) and how Skillcast can help you to comply with the good practices and avoid the bad practices.

FCA: Examples of good practice for training

The firm is committed to carrying out business fairly, honestly and openly.

Senior management lead by example in complying with the firm's anti-corruption policies and procedures.

Responsibility for anti-bribery and corruption systems and controls is clearly documented and apportioned to a single senior manager or a committee with appropriate terms of reference and senior management membership who reports ultimately to the board.

Anti-bribery systems and controls are subject to audit.

Management information submitted to the board ensures they are adequately informed of internal and external developments relevant to bribery and corruption and respond to these swiftly and effectively.

How Skillcast helps you comply with good practices

Our Anti-Bribery e-learning (including FCA guidance) devotes 70% of content to **interactive, practical exercises**, ensuring employees apply fairness, honesty and openness in real-life situations.

Our **customisable training** embeds firm policies into staff learning, while the LMS provides MI and diagnostic reporting so boards and senior managers can monitor compliance and lead by example.

Our **LMS enables** policy attestation and generates role-based compliance reports, ensuring responsibilities are visible and supported with evidence to senior management.

The Skillcast LMS is **audit-ready**, tracking completions, assessments and attestations, and providing a documented audit trail for regulators and internal review.

Our **diagnostic reporting and dashboards** equip boards with timely and detailed insights into training performance and risks, enabling swift and effective responses.

FCA Training Aid

Anti-bribery Tips

FCA: Examples of good practice for training

Corruption risks are assessed in all jurisdictions where the firm operates and across all business channels.

The firm considers factors that might lead business units to downplay the level of bribery and corruption risk to which they are exposed, such as lack of expertise or awareness, or potential conflicts of interest.

The firm clearly sets out behaviour expected of those acting on its behalf.

There are unambiguous consequences for breaches of the firm's anti-corruption policy.

Risk-based, appropriate additional monitoring and due diligence are undertaken for jurisdictions, sectors and business relationships identified as higher risk.

Staff responsible for implementing and monitoring anti-bribery and corruption policies and procedures have adequate levels of anti-corruption expertise.

Where appropriate, the firm refers to existing sources of information, such as expense registers, policy queries and complaints hotlines, to monitor the effectiveness of its anti-corruption systems and controls.

How Skillcast helps you comply with good practices

Our scenario-based training is relevant across jurisdictions and industries, helping staff recognise risks beyond generic external assessments.

Our **interactive examples** and refresher modules raise awareness, challenge assumptions and reduce the risk of underestimating bribery exposure.

Skillcast modules use **interactive scenarios and assessments** to evidence understanding and compliance. Staff attestations can also be managed in the LMS.

Courses are **regularly updated** to reflect FCA guidance, and firms can easily customise them to reflect their policies and consequences of breaches.

Our **training, checklists and tools** guide staff in recognising red flags, going beyond generic code-of-conduct wording.

Skillcast provides **Gifts & Hospitality training** and a register tool to record and approve activity, while refresher modules ensure ongoing competence.

Our **whistleblowing training and compliance register tools** support firms in monitoring effectiveness and responding to internal and external triggers.

FCA Training Aid

Anti-bribery Tips

FCA: Examples of good practice for training

Political and charitable donations are pre-approved at an appropriate senior management level, with compliance input.

Firms who do not provide staff with access to whistleblowing channels may fail to raise concerns in confidence or, where possible, anonymously, with adequate protections.

Where a firm uses third parties to generate business, these relationships are subject to thorough due diligence and management oversight.

The firm reviews in sufficient detail its relationships with third parties on a regular basis to confirm that it is still necessary and appropriate to continue with the relationship.

The firm includes specific anti-bribery and corruption clauses in contracts with third parties.

There are higher or extra levels of due diligence and approval for high risk third-party relationships.

The firm's compliance function has oversight of all third-party relationships and monitors this list to identify risk indicators, for example a third party's political or public service connections.

How Skillcast helps you comply with good practices

Our **scenario-based training** highlights risks linked to political or charitable contributions, ensuring staff escalate appropriately for compliance approval.

Our **whistleblowing process** training gives staff confidence to raise concerns, and our LMS register tools provide a mechanism to record breaches and complaints.

Our **training, templates and checklists** guide staff through robust third-party due diligence and monitoring, ensuring oversight is properly applied.

Refresher training and registers help staff apply scrutiny even to long-standing third-party relationships.

Our training provides **practical examples of contractual protections**, supporting staff in recognising and applying them.

Skillcast training and checklists support enhanced **due diligence**, while the LMS provides an audit trail for approvals.

Skillcast's LMS reporting provides **compliance oversight**, with diagnostic tools to identify high-risk groups or relationships needing extra training.

FCA Training Aid

Anti-bribery Tips

FCA: Examples of good practice for training

There is a lack of awareness of, or engagement in, anti-bribery and corruption at senior management or board level.

An 'ask no questions' culture sees management turn a blind eye to how new business is generated.

Little or no management information is sent to the board about existing and emerging bribery and corruption risks faced by the business, including: higher risk third-party relationships or payments; the systems and controls to mitigate those risks; the effectiveness of these systems and controls; and legal and regulatory developments.

Departments responsible for identifying and assessing bribery and corruption risk are ill equipped to do so.

The firm considers factors that might lead business units to downplay the level of bribery and corruption risk to which they are exposed, such as lack of expertise or awareness, or potential conflicts of interest.

How Skillcast helps you comply with good practices

Our LMS **reporting and dashboards** keep senior management informed of staff compliance, gaps and risks, ensuring active engagement at board level.

Our **interactive training** uses real-life scenarios to highlight bribery risks in business generation, encouraging staff and managers to challenge and escalate concerns.

The Skillcast LMS generates comprehensive **MI and diagnostic reporting**, giving the board visibility of risks, controls and staff compliance at all times.

Our **Anti-Bribery and Corruption courses** ensure all relevant staff are trained to recognise and assess risks, supported by refresher modules to maintain competence.

Our e-learning courses include **tests, scenarios and attestations**, giving firms measurable evidence of compliance.

Gifts & Hospitality

Compliance Checklist

When giving and receiving gifts or hospitality always remember these 6 golden rules

- 1 Refer to guidance in your company's policy:** A Gifts, Hospitality and Expenses policy should set limits, outline approval steps and define what is acceptable.
- 2 Avoid cash transactions:** Refrain from giving or receiving cash, as it can be perceived as a bribe. Opt for token or novelty items branded with the company logo instead.
- 3 Stick to the gift value limit:** Ensure gifts and hospitality are of appropriate value, not exceeding your company's specified thresholds.
- 4 Keep a record:** Make sure you are transparent and all gifts and hospitality are declared in the Gifts and Hospitality Register.
- 5 Decline when in doubt:** Seek guidance if you're unsure, but if there is lingering doubt, politely refuse gifts or hospitality that could be inappropriate.
- 6 Report concerns:** Remember gifts and hospitality should never influence (or appear to influence) business decisions. If you suspect bribery risks, use the whistleblowing channel.

Anti-Bribery Training

Ensuring anti-bribery compliance is crucial for your organisation. Our courses provide essential training on bribery prevention, helping you understand and mitigate the risks associated with corruption and unethical practices.

Example Topics Covered

Understanding Bribery: What bribery is, its impact on businesses, and the consequences for those involved.

Key Legislation: Overview of the UK Bribery Act 2010 and the US FCPA, including penalties and obligations.

Red Flags and Risks: Common signs of bribery, like intermediaries and non-cash favours, and how to address them.

Corporate Responsibilities: How organisations can be held liable for associated persons' actions under bribery laws.

Gifts, Hospitality, and Payments: Best practices for managing gifts and expenses to comply with anti-bribery policies.

Reporting and Advice: When to seek advice, report concerns, and follow anti-bribery policies.

Our course will prepare your employees to:

- Identify money laundering and terrorist financing activities.
- Conduct effective, risk-based customer due diligence.
- Spot and act on common red flags.
- Seek advice and report suspicions appropriately.
- Adhere to obligations, including avoiding tipping off suspects.



Skillcast helps companies to create compliance awareness and inspire their employees to act with integrity.

We offer bespoke e-learning content development, libraries of ready-made courses and a digital platform specifically built for compliance training.

Over 1400 companies use our digital products to deliver millions of learning interventions each year.

Demo the Skillcast Learning Management System