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# Implementing new anti-corruption legislation

Selected lessons learned from the  
implementation of the UK - Bribery Act 2010

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# OBJECTIVES?

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bribery prevention and responsibility  
as part of corporate good governance

avoid the imposition of unnecessary  
administrative burdens

# WHAT KIND OF FRAMEWORK?

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mainstream criminal law or regulatory standards or both?

UK - Bribery Act 2010 /Financial Conduct Authority

# THE BRIBERY ACT SECTION 7

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not a substantive offence

full defence - "adequate" procedures

prevention not protection – not a corporate safe harbour

Ministry of Justice Guidance - principles not standards - proportionality

# Prosecution Policy

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encourage self-referral

alternatives to prosecution – Civil recovery - no guarantees

structured diversion - Deferred Prosecution Agreements

# Implementation

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communication and consultation

awareness raising

SMEs

inter-agency liaison

monitor response