Accountants for the real world

Anti-bribery policy

Document properties

Version	V2.0
Owner	Company Secretary
Approval body	AAT Board
Date of approval	30 July 2026
Supersedes when issued	V1.0
Date of issue	4 August 2026
Formal review deadline	30 July 2029
Publication	One AAT, aat.org.uk, Auditors, Regulators
Monitor and review	• The Policy Review Group and the Policy Owner will review the policy on an annual cycle to ensure continued compliance. • The Audit and Risk Committee will regularly monitor the effectiveness of all policies as appropriate. • The formal review process will take place every three years.

Change control

Date	Version	Section	Changes made (include rationale and impact on practice)
Oct 2017	V1.0	All	New policy
Mar 2026	V2.0	All	Policy completely rewritten in line with new policy template

Associated documents

Anti-Fraud Policy; Whistleblowing Policy; Code of Conduct; Conflicts of Interest Policy

Contents

1. Summary and purpose

1.1 AAT adopts a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all dealings and relationships, in line with the Bribery Act 2010. This includes clear expectations for the giving and receiving of gifts and hospitality.

2. Scope and applicability

2.1 This policy applies to all employees and Associated Persons, including volunteers, trustees, governance body members, contractors, suppliers, consultants, partners, agents and intermediaries, and explicitly covers AAT and any of its subsidiaries.

2.2 All employees and Associated Persons are expected to adhere to this policy. This policy is owned by the AAT Board.

3. Terms and definitions

3.1 Terms and definitions:

- **Bribery:** Offering, promising, giving, requesting or receiving a financial or other advantage intending to induce improper performance or influence a decision.
- **Corruption:** Abuse of entrusted power for private gain.
- **Facilitation payments:** Unofficial payments to expedite routine actions.
- **Associated Person:** Any person or entity performing services for or on behalf of AAT.
- **Business Gifts** (includes hospitality): gift items, entertainment and hospitality.

3.2 Roles and responsibilities:

- **Board of directors/Trustees:** Approves this policy and oversees its implementation. Ensures the organisation maintains effective governance and fraud-prevention controls. Reviews fraud-risk reports and significant investigations.
- **Executive Leadership Team**: Ensures the Anti-Bribery Policy is effectively implemented. Promotes an ethical culture and compliance with legal obligations. Receives the register of gifts.
- **Finance Director**: Approval for accepting non-moderate gifts, approval of offering gifts and holds the register.

4. Policy details

Policy statement

4.1 AAT has zero tolerance of bribery and improper inducements. Allegations will be investigated promptly and may result in disciplinary, contractual, regulatory or legal action. AAT will maintain strong internal controls, accurate records, proportionate due diligence, safe reporting channels and regular training.

Principles

4.2 Zero-tolerance and integrity. Everyone must avoid conflicts of interest and any appearance of improper influence. Retaliation against anyone refusing a bribe or raising concerns is prohibited.

4.3 Strong controls. Clear authorisation limits, due-diligence checks, accurate record-keeping (including gifts/hospitality), and segregation of duties.

4.4 Robust investigations. Fair, timely, confidential and objective, preserving evidence and documenting outcomes.

4.5 Accountability at all levels. Trustees provide oversight; ELT and senior managers ensure implementation; all staff comply and report concerns.

Gift and hospitality - accepting

4.6 Modest gifts (illustratively up to £25 retail value) and low-value promotional items (e.g., pens, diaries) may be accepted without manager approval; light refreshments in meetings are acceptable.

4.7 If refusal of a more substantial unsolicited gift could cause offence, it should normally be returned with an explanation; where accepted, it should be donated to charity.

4.8 In exceptional cases (e.g., token of gratitude for exceptional service), prior written permission from the Director of Finance is required to accept a higher-value gift.

4.9 Hospitality must be conventional and reasonable (no improper inducement; would not embarrass AAT if disclosed; venue appropriate; not frequent enough to suggest improper motive). Accommodation/transport linked to business events may be accepted where reasonable and consistent with normal practice. When in doubt, seek advice from the Finance Director.

Gifts and hospitality - offering

4.10 Prior approval from the Finance Director is required before offering gifts or hospitality (identify recipient, purpose, nature and value).

4.11 Offers must have a legitimate business purpose, be proportionate, and not serve as an inducement; no poor-taste venues; avoid frequency that implies improper motive. Cash or cash-equivalents (e.g., gift cards) must not be offered.

4.12 Special rules apply to government employees: gifts/hospitality may be restricted or unlawful. AAT will strictly comply with all such restrictions.

4.13 Unauthorised gifts/hospitality will not be reimbursed and may result in disciplinary action; if paid by AAT, employees may be required to refund the cost.

Gifts and hospitality registers

4.14 All gifts and hospitality (other than low-value promotional items and routine refreshments) must be recorded on the central Gifts & Hospitality Register maintained by the Financial Controller; Board members must notify the Company Secretary who holds a separate register. Queries can be directed to the Finance Director.

Strictly forbidden conduct

4.15 Giving or receiving cash or cash equivalents as a business gift.

4.16 Gifts/hospitality that are excessively costly or frequent; that reward government employees; that influence or appear to influence business judgment; that violate the recipient's policy; or tickets/entertainment where the host will not attend.

Reporting concerns (including whistleblowing)

4.17 All employees and Associated Persons must report suspected bribery immediately. Report to the CEO or Company Secretary in the first instance, or via the Whistleblowing Policy (company.secretary@aat.org.uk).

Investigation

4.18 Investigations will be prompt, impartial, confidential and fully documented; may involve Human Resources, Legal & Governance, Finance, Internal Audit and IT system audit or external specialists as required; outcomes are reported to senior management and the Audit & Risk Committee; regulators notified where appropriate.

Disciplinary

4.19 Bribery constitutes gross misconduct. Sanctions may include dismissal, contract termination, civil recovery, and reporting to law enforcement. Where a gift/hospitality is more than "modest" in value, offences may normally be treated as gross misconduct (per disciplinary policy).

Cultural considerations

4.20 When working abroad or with overseas parties, cultural norms may differ; employees should seek guidance from the Finance Director where necessary.

5. Monitoring and audit

5.1 The Audit and Risk Committee is responsible for monitoring compliance with all aspects of policies.

5.2 If you are aware of any deviations from the policy, or breaches of process, it must be documented and reported to the policy owner and/or Company Secretary at company.secretary@aat.org.uk and, where appropriate, with recommendations for corrective actions or improvements.