

Alert 10-180



The Bribery Act 2010

Update on timetable for implementation

The UK Ministry of Justice ("MoJ") has [announced](#) the timetable for when the UK Bribery Act 2010 ("the Act") will come into force and for the preparation of the statutory guidance as to what constitutes "adequate procedures" for the purposes of the new corporate offence.

The MoJ announcement states that:

- the Act will come into force in April 2011 (a year after it received royal assent); and
- in September 2010 the Government will launch a short consultation exercise on the adequate procedures guidance. The final form of this guidance will be published early in 2011 to allow businesses time to implement changes to their procedures before the Act comes into force.

The Act creates a new corporate offence of failing to prevent bribery. It is a defence for a commercial organisation to show that it had in place adequate procedures designed to prevent bribery. It will be crucial therefore for businesses that are covered by the Act to review their anti-corruption policies and procedures in the light of the new guidance and implement any changes before the Act comes into force.

More information about the Act can be found in our Client Briefing Note "[The Bribery Act 2010](#)".

Reed Smith's Global Regulatory Enforcement Group can help

Our Global Regulatory Enforcement ("GRE") Group, with specialised lawyers drawn from our offices worldwide, has wide experience in a broad range of government agency investigations and internal investigations in key industry sectors including defence, pharmaceuticals/healthcare and oil and gas across Europe, the United States, the Middle East and Asia. Our GRE lawyers based in London have substantial expertise in assisting international corporations and regulated individuals involved in significant and high profile enforcement investigations conducted by, amongst others, the SFO and the FSA.

If you have any questions about the Bribery Act or related subjects, or want assistance in reviewing your compliance procedures in the light of these changes, Reed Smith can assist. Please do not hesitate to contact the authors of this briefing or any of the GRE lawyers identified or your usual Reed Smith contact.

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