



# BRITISH EXPORTERS ASSOCIATION

31<sup>st</sup> July 2018

## **Select Committee on the Bribery Act 2010**

House of Lords  
London SW1A 0PW

### **CALL FOR EVIDENCE - THE BRIBERY ACT 2010**

#### **Overview of BExA**

The British Exporters Association (BExA) is an independent national trade association representing the interests of the UK's exporters. Our membership is drawn from across the exporting community, including capital goods manufacturers and international traders (large corporates, MSBs, SMEs and Micro exporters), and their bank, credit insurance and other service providers. BExA seeks to promote the interests of its members and all UK exporters, with a particular focus on trade finance and export credit insurance.

#### **BExA response to the above:**

Whilst the focus of the review is understood, it is important to point out that BExA is keen to confirm its overall support for the Act. The desire to prevent and eradicate bribery and corruption is clearly of importance both here in the UK and across the globe.

Save for our overarching support for the Act, BExA would wish to highlight the support that HM Govt. needs to provide to companies of all size and industry sectors, such that they are able to adequately understand and deal with the requirements of the Act, and ensure that they are therefore able to mitigate bribery and corruption risk.

As a general rule, larger organisations have dedicated resources and experience, which enable them to interpret and apply the requirements of the Act. The majority of SMEs have limited resource and are therefore less able to give full focus to the requirements of the Act and may, as a result, be more prone to acting in line with "common business practices". These common business practices may, in some global jurisdictions, see some potential for bribery and corruption as a more accepted facet of doing business.

It is our belief that our members are very much supportive of the eradication of bribery and corruption, but thought needs to be given to highlight how businesses can compete effectively in jurisdictions where there is a greater degree of acceptance of B&C as a business practice. Furthermore, that support needs to be provided to the UK business community as a whole, and particularly SMEs who have limited resources and therefore have to contend with multiple competing priorities.

Providing good quality guidance and support to businesses to ensure they have procedures in place to prevent bribery and corruption, is vital and should be considered as key take away from this review.

There is also the opportunity for UK businesses to utilise the Act, and indeed the accompanying strong processes, protocols and good corporate governance which organisations create, to become a differentiating factor when doing businesses overseas. Using the strength of the UK legislation when overlaid with appropriate individual business due diligence and due process, can provide reassurance and differentiation to overseas suppliers or customers, thereby enabling contracts to be secured which may not otherwise have been the case. Focus needs to be given to support businesses to use “best in class” standards, legislation, regulation, etc. as a means of leverage business opportunity rather than restricting and constraining business.

We hope the above is input is of value and would be happy to further expand if requested to do so.



Marcus Dolman  
Co-Chairman – Large Exporters



Geoffrey de Mowbray  
Co-Chairman - SME & Micro Exporters