VERSION 2.0 / BRIBERY AND CORRUPTION

Third-party due diligence planner

Prepared with Metis (AI). Use before appointment, renewal or a material change. Output: evidence record, action plan, authorised decision and monitoring arrangements. One record per engagement.

Toolkit disclaimer
Toolkit materials are for general information and education. They do not constitute official guidance, legal advice, or other professional advice, and using them does not guarantee compliance. Check the requirements that apply to your situation and seek qualified advice where needed.

This static worksheet does not calculate, automatically save or transmit entries. Keep sensitive evidence in approved systems; enter references here. Copy action pages as needed. Label continuations with case reference, question/action ID, preparer, date and page number.

Case reference / assessment date / entity and registration jurisdiction / lifecycle stage

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Business need / scope / deliverables / value and currency / locations

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Next commitment (gate) / date / person controlling signature, work or payment

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Sponsor / relationship owner / preparer / reviewer / decision authority

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Applicable policies and authority limits / conflicts and recusals

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Specialist referrals: process, owner, status, linked record and affected gate

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Gate: the next activity creating exposure, such as signature, work or payment. Record who can block it. Internal audit may independently assess the process within its remit; management owns engagement decisions and controls.

Q01 - Q03

Record the answer and its limits

S Supported: enough evidence for the stated answer; exposure may remain high. **C** Concern: adverse indication or contradiction, not proof of misconduct. **U** Unknown: missing/insufficient; blanks mean U. **N/A** Not applicable: give a reason, not a substitute for missing evidence.

Q01 / Purpose and selection

What will the party deliver, why is it needed, and why was it selected?

Check: Scope, deliverables, selection record and a supported reason for sole sourcing if used.
Look deeper: Vague work, unexplained nomination, retrospective engagement or pressure to skip review.

Status: [ ] S [ ] C [ ] U [ ] N/A | Related action ID: _____

Answer / evidence reference and date / limits / N/A reason

Q02 / Entity and capability

Do the contracting identity and actual delivery capability match the proposed work?

Check: Current registry or lawful equivalent, identifiers, relevant licences, delivery team and independently checked experience.
Look deeper: Different contracting or invoicing entity; capacity depends on unexplained access or hidden intermediaries.

Status: [ ] S [ ] C [ ] U [ ] N/A | Related action ID: _____

Answer / evidence reference and date / limits / N/A reason

Q03 / Ownership and control

Who ultimately owns, controls or benefits from this relationship?

Check: Trace material layers and control rights; compare declarations with lawful independent records. Record limits of access.
Look deeper: Unexplained nominees, inconsistent ownership, or a material controller who cannot be identified.

Status: [ ] S [ ] C [ ] U [ ] N/A | Related action ID: _____

Answer / evidence reference and date / limits / N/A reason

Q04 - Q06

Record the answer and its limits

S Supported: enough evidence for the stated answer; exposure may remain high. **C** Concern: adverse indication or contradiction, not proof of misconduct. **U** Unknown: missing/insufficient; blanks mean U. **N/A** Not applicable: give a reason, not a substitute for missing evidence.

Q04 / Connections and influence

Who has a relevant connection to a selector, approver or other decision maker?

Check: Proportionate declarations from both sides, referral history, selection evidence and recusal arrangements.
Look deeper: Undisclosed financial or personal interest; a conflicted person directing selection or approval.

Status: [ ] S [ ] C [ ] U [ ] N/A | Related action ID: _____

Answer / evidence reference and date / limits / N/A reason

Q05 / Public contacts and locations

Who will approach public bodies or state-owned entities, about what, and where?

Check: Map activities, jurisdictions, officials or public buyers, permissions and meeting records. Seek local advice on classification.
Look deeper: Official-facing intermediary, permit or tender exposure; unexplained location or payment-country mismatch.

Status: [ ] S [ ] C [ ] U [ ] N/A | Related action ID: _____

Answer / evidence reference and date / limits / N/A reason

Q06 / Delegates and benefits

Who else will act or receive value, including gifts, hospitality, donations and expenses?

Check: Delegate identities and tasks, consent arrangements, benefit purposes and recipients, approvals and reimbursement evidence.
Look deeper: Unnamed subcontractor, unapproved official contact, pass-through fee or benefit linked to a decision.

Status: [ ] S [ ] C [ ] U [ ] N/A | Related action ID: _____

Answer / evidence reference and date / limits / N/A reason

Q07 - Q09

Record the answer and its limits

S Supported: enough evidence for the stated answer; exposure may remain high. **C** Concern: adverse indication or contradiction, not proof of misconduct. **U** Unknown: missing/insufficient; blanks mean U. **N/A** Not applicable: give a reason, not a substitute for missing evidence.

Q07 / Compensation

Can the amount and incentive structure be justified against actual work?

Check: Fee comparison or commercial rationale; separate commissions, margins, success fees, advances and expenses.
Look deeper: Award-linked fee, unexplained premium, vague expenses or an advance without a clear purpose.

Status: [ ] S [ ] C [ ] U [ ] N/A | Related action ID: _____

Answer / evidence reference and date / limits / N/A reason

Q08 / Recipient and payment route

Does the intended recipient match the approved arrangement?

Check: Reconcile contract, invoice, vendor master and beneficiary. Verify changes using an independently obtained contact and authorised payment controls.
Look deeper: Unexplained third-party recipient, cash or split-payment request, or an unverified account change.

Status: [ ] S [ ] C [ ] U [ ] N/A | Related action ID: _____

Answer / evidence reference and date / limits / N/A reason

Q09 / Adverse information

Does relevant adverse information concern this party, and what does it establish?

Check: Resolve identity with identifiers; record original source, date, procedural status, relevance and evidenced remediation.
Look deeper: Credible unresolved allegation or finding; possible restriction; contradictory evidence. A name match alone is unresolved.

Status: [ ] S [ ] C [ ] U [ ] N/A | Related action ID: _____

Answer / evidence reference and date / limits / N/A reason

Q10 - Q12

Record the answer and its limits

S Supported: enough evidence for the stated answer; exposure may remain high. **C** Concern: adverse indication or contradiction, not proof of misconduct. **U** Unknown: missing/insufficient; blanks mean U. **N/A** Not applicable: give a reason, not a substitute for missing evidence.

Q10 / Controls in use

Can the party demonstrate the controls needed for this engagement?

Check: Proportionate examples of approvals, training, reporting and delegate oversight; distinguish written policy from evidence of use.
Look deeper: Refusal to address a material issue, inconsistent records or a key safeguard that cannot operate.

Status: [ ] S [ ] C [ ] U [ ] N/A | Related action ID: _____

Answer / evidence reference and date / limits / N/A reason

Q11 / Contract and service evidence

Can your organisation enforce the agreed boundaries and verify delivery?

Check: Defined work and permitted contacts, proportionate information and audit rights, response/exit provisions, service acceptance and invoice approval.
Look deeper: No credible service evidence, unenforceable essential condition or no independent check of the invoice.

Status: [ ] S [ ] C [ ] U [ ] N/A | Related action ID: _____

Answer / evidence reference and date / limits / N/A reason

Q12 / Continuing ownership

Who will notice changes and act on a failed condition?

Check: Named relationship and control owners, evidence to inspect, review date, change triggers and failure route.
Look deeper: No accountable operator, missed condition or changes to owners, scope, delegates, contacts, fees or bank details.

Status: [ ] S [ ] C [ ] U [ ] N/A | Related action ID: _____

Answer / evidence reference and date / limits / N/A reason

ACTION RECORD / COPY THIS PAGE AS NEEDED

Turn each issue into assigned work

Apply every relevant route; a score cannot cancel an unresolved issue. **Pause/escalate:** credible improper benefit or fabricated evidence; material ownership/payee mismatch; unverified bank change; possible prohibition; bypass pressure. **Enhanced:** public contacts, conflicts, award-linked fees, opaque ownership, delegates, unusual payments or credible adverse information. **Resolve gaps:** material unknowns keep the affected gate pending. **Normal review:** sufficient evidence and required specialist results; no higher unresolved route.

These are editorial planning rules, to adapt to law and policy. For active work, ask authorised teams to decide and implement a hold. Log confirmation. Preserve relevant records and use authorised investigation channels; do not make informal accusations.

Action / issue 1

ID / Q reference / route / fact, allegation or missing fact / significance

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Evidence reference / date / source quality / remaining limitation

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Required check or safeguard / owner / deadline / affected gate

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Completion evidence / verifier and date / status / hold operator confirmation

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Action / issue 2

ID / Q reference / route / fact, allegation or missing fact / significance

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Evidence reference / date / source quality / remaining limitation

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Required check or safeguard / owner / deadline / affected gate

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Completion evidence / verifier and date / status / hold operator confirmation

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AUTHORISED DECISION / NO AUTOMATIC CLEARANCE

Decide what may happen next

Outcome: [ ] Proceed [ ] Proceed with conditions [ ] Defer [ ] Decline [ ] Refer.
Decide separately for signature, work and payment where needed. A referral stays tracked until accepted by the receiving owner. An exception cannot override law or make missing evidence verified.

Decision maker / role and authority / date / conflicts and recusal

Reasons / evidence relied on / residual exposure / unresolved actions

Activity authorised / activity blocked / operator informed and acknowledgement

Condition ID / required evidence / owner / due before which activity

Operational block / who verifies completion / who confirms release / actual state

Exception: permitted policy basis / rationale / approver / limits / expiry / retest

Condition state: Pending / Satisfied with evidence / Breached / Authorised policy waiver. A pre-payment condition is too late if the exposure begins at signature or first work. Copy this page for further conditions; link action IDs.

MONITORING / CONTROL EVIDENCE

Keep the decision under review

Assign a management owner for ongoing checks. Record how a safeguard works in practice, rather than relying only on a signed policy. Internal audit can assess independently within its remit.

Control objective / engagement or transaction covered / operator

When the control runs / evidence it leaves / approved record location

Who verifies operation / sample or check / result / date

Failure response / action owner / due date / retest result

Monitoring owner / frequency and rationale / next review date

Reopening triggers / change notification owner / specialist referrals still open

Reopen on: material changes to owners, activities, locations, official contacts, delegates, fees or bank details; new credible concerns; missed conditions or failed safeguards. Keep acknowledged referral records and outstanding gates linked. Closing the planning file does not close ongoing monitoring.

Three ways a file can progress

Routine / R-01: office-equipment maintenance

Entries: Q01 fixed EUR 4,800 service scope (S, scope R1); Q02 identity and capability (S, registry R2/reference R3); Q03 controller reconciled (S, R4); Q04 no relevant connection declared and checked (S, R5); Q05 no public contacts (N/A, private-site work only); Q06 no delegates or benefits (S, terms R6). Q07-Q12 supported by fee comparison R7, beneficiary check R8, identity-resolved search R9, control example R10, service acceptance terms R11 and monitoring plan R12.

Output: normal review, no open material gaps. Fictional procurement approver authorises signature on 10 November under assumed policy. Relationship owner checks service acceptance monthly; finance checks invoice and recipient before each payment. Review at renewal, earlier on change.

Concerning / C-01: public-tender consultant

Entries: Q05 public-buyer meetings (S, proposal C1); Q07 award-linked fee (S, C1); Q08 proposal requests payment to another company with no basis (C, C2). Q03 recipient control unknown (U). Supported public exposure and fee still require enhanced work.

Output: pause/escalate proposed signature and payment. Finance confirms blocks C3; compliance requests recipient/control evidence, procurement examines fee rationale, legal checks tender/contact rules before any release. Decision deferred; no clearance or misconduct finding. Preserve C1-C3. Assigned owners report before the gate; missing answers remain open.

Incomplete / I-01: expired evidence and a limited exception

Entries: Q02 prior registry extract is stale (U, I1); Q03 declaration conflicts with earlier controller record (C, I2/I3). A policy also asks for two commercial references; one is unavailable (U, I4). An unavailable register is not N/A.

Output: defer signature and work until material identity/control gaps are reconciled. Under a fictional policy allowing substitution, the authorised compliance lead accepts independently verified prior-delivery evidence I5 instead of the second reference, limited to this renewal and expiring in 30 days. Exception I6 does not close Q02/Q03. Procurement owns fresh verification; compliance owns reconciliation. No payment or work permission follows from I6.

All entities, amounts, evidence IDs, approvals and policy terms above are fictional. Use your actual policy and authority limits. Routine approval does not establish that misconduct is impossible.

Basis and version history

OECD
2021 Anti-Bribery Recommendation, OECD/LEGAL/0378; revised 26 November 2021. Annex II A.6, printed pp.20-21. Non-binding foreign-bribery good practice.
Open official source

UNODC / UN Global Compact
An Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide (2026), chapter III.I, printed pp.70-75. International guidance on business partners.
Open official source

UK Ministry of Justice
The Bribery Act 2010: Guidance (March 2011), Principle 4, paras.4.1-4.5, printed pp.27-28. UK statutory-guidance context, not universal duties.
Open official source

US Department of Justice
Evaluation of Corporate Compliance Programs (September 2024), I.E, printed pp.8-9. US prosecutorial evaluation guidance.
Open official source

Source passages checked 10 November 2026 (Europe/Berlin). Titles and locators support use of the printed copy. Confirm current versions and jurisdictional applicability. The prompts, statuses, routes, gates and fictional examples are editorial design choices; they are not a mandatory international procedure.

What changed

2.0 / 10 November 2026: rewritten task sequence; twelve consolidated evidence prompts; explicit gate ownership, operating proof, condition release and limited exceptions; routine, concerning and incomplete examples.
1.1 / 8 November 2026: source and instruction corrections.
1.0 / 5 November 2026: first published edition.
Earlier PDFs are retained. Approved for publication 10 November 2026.