



Combating
bribery in
the SME
sector –
UK analysis

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Combating bribery in the SME sector – UK analysis

About this report

In 2007, ACCA conducted its first research into the impact of bribery and corruption on the small and medium-sized enterprise (SME) community, focusing exclusively on the UK (ACCA 2007). Gaining greater understanding of how bribery and corruption affects SMEs and how they can mitigate their associated risks is important. Most attention has traditionally focused on international businesses and public bodies, but SMEs form the backbone of the economy and some will grow to become the leading businesses of tomorrow.

In 2013, ACCA carried out further research, broadening the scope of the survey to include international respondents and to reflect changes in the legal and economic landscape, as businesses adapted to the UK Bribery Act 2010 and the impact of the global financial crisis (Davies and Mirkovic 2013a). Now in 2019, the survey has been repeated to highlight again the particular challenges facing SMEs around the world. As in 2013, the results include a substantial body of responses from the UK and this report identifies the key results specific to the UK.



Foreword



2019 marks the third publication of ACCA's survey of the UK SME population's awareness of and attitudes to bribery and corruption. Our members stand in the forefront of the fight against these threats to integrity, stability and good governance, and developing an understanding of the issues and challenges that our members and their clients face is key to helping them respond effectively.

At the time of the last survey, the UK had recently implemented the Bribery Act 2010, and the world was still recovering from the impacts of the global financial crisis. Six years on and the challenges are very different, with business mired in uncertainty over the country's future relationship with Europe, while the global economy responds to the twin challenges of digitalisation and environmental concerns.

While the latter might not seem to have much direct impact on bribery and corruption, the former has huge implications. The ease of doing business across borders raises the opportunity for UK SMEs to expand their horizons into new markets, but at the same time increases the potential exposure to new risks in unfamiliar regulatory environments and business cultures.

Meanwhile the scope for digital payment technologies to anonymise transactions and facilitate the flow of illegal funds increases the challenge for law enforcement to identify and trace corrupt payments. More than ever, it is the ethical values of the individual which stand as the most effective barrier to criminal behaviour.

But if the individual is to make a stand against bribery and corruption, we must ensure that they have the guidance, the tools and the support they need to follow through on that commitment to behave with integrity. The appointment of an Anti-corruption Champion by the UK government signals a clear commitment to act, while initiatives across the business and NGO sectors provide resources.

Of course there is always more that can be done, and some of the most important actions lie not with SMEs but with their larger business partners, and government itself. Corporate culture is often highlighted as a key element in the fight against corruption, but for the smallest businesses that culture comes as much from their surroundings as from within. Pressure from the supply chain is on the increase as a risk area, emphasising the need for larger partners in the commercial world to ensure a level playing field for all their suppliers.

Meanwhile, the provision of strong protections for whistleblowers where bad behaviour does come to light is on the rise as a focus area for respondents in the UK and worldwide. Government has a part to play setting, and enforcing, rules to encourage accountability, while all involved can help to develop and encourage the reporting mechanisms needed to ensure that the same message gets through to law enforcement where criminal behaviour is encountered.

Bribery and corruption are a threat to all of us in society, and everyone has a role in combatting them.

Maggie McGhee
Executive Director Governance, ACCA

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A man with dark hair and a beard, wearing a light blue button-down shirt, is looking down and to the left. He is holding a white marker in his right hand. In the background, there is a whiteboard with a diagram consisting of several boxes and lines. A red square is drawn around the top-left corner of the whiteboard area.

Research base

The findings presented here are based on an online survey conducted in July 2019. This 2019 survey was conducted among ACCA members and via public link, and covered 932 respondents globally, including 40% working in businesses in the corporate sector, 8% each in not-for-profit and the public sector and 27% in an accountancy business and providing professional services to SMEs.

The main findings of this survey are set out over the following pages, and compared where appropriate with findings from the 2013 survey (exclusively of ACCA members, including members working within SMEs as accountants or general managers (63%) and those in public practice providing professional services to SMEs (29%). A small number of members working in the public sector (4%) also took part.). This report analyses the 210 responses (2013: 205) received from the UK, and is presented as additional analysis to that in the main global report.

For the purposes of this research, 'bribery and corruption' is treated as a single issue, in line with the typical approach taken by leading organisations. Given that one objective of the survey was to gauge understanding of the term 'bribery and corruption', respondents were not given any formal definition in order to avoid influencing their perceptions.

The questions asked in 2007 were not in all cases exactly the same as those asked in 2013 and 2019. Comparative results have been provided in the analysis where appropriate.



Introduction

According to the World Economic Forum, businesses and individuals globally pay more than \$3.6 trillion in bribes every year (Johnson 2018). A Transparency International (2017) survey of over 160,000 respondents found that nearly one in four people said they had paid a bribe for public services in the previous 12 months.

Bribery and corruption is as much a threat today as it has ever been, and is not restricted to any sector of society, any region of the world, or any aspect of the business world. Wherever there is gain to be made, or power to exercise, the risk exists that some individuals will seek an unfair advantage to benefit themselves.

Although many consider the UK to be a low-risk environment for bribery and corruption, that may not necessarily be the case. Recent research has highlighted many areas where the true picture may not be known (Fraud Advisory Panel 2019), while the growth in international



[Bribery and corruption is] unlikely to affect those trading mainly in UK and EU.

Respondent, England

[Bribery and corruption is a concern for SMEs] because it's more common than we realise and it's insidious.

Respondent, England

[Bribery and corruption is a concern for SMEs] because technology has made the world so much smaller and obtainable.

Respondent, England

trade and the ease with which SMEs can look to enter new markets has also opened up their exposure to risk. The opportunities offered as the economy and global dispatch networks become digitalised come with attendant risks, to which smaller businesses may not always be alert.

Whatever the direct cause of corrupt behaviour, and whatever the sector involved, the effect of bribery and corruption is to damage confidence in the integrity of the business sector and to harm the interests of those who are not party to the corrupt practices.



1. SME exposure to bribery and corruption risk

In 2013, 27% of respondents thought that SMEs were not generally likely to face any risk of bribery and corruption in the course of their business dealings, while almost half (48%) thought they definitely would do so.

That position seemed to indicate a lessening of concern since the 2007 survey, when fewer than 10% reckoned that exposure to bribery and corruption was unlikely, while 70% disagreed and argued that SMEs would encounter bribery and corruption. In 2019, the position has returned more closely to that seen in 2007, with 17% of respondents dismissing the likelihood of encountering bribery and corruption, while 71% considered it likely.

In 2013, respondents were asked whether the impact of the global financial crisis and the resulting pressures had affected businesses' approach to misrepresenting financial information. Fewer than one in five (19%) of UK respondents thought businesses had been more willing to misstate financial statements to cover up for corrupt behaviour and fraud since the onset of the global financial crisis, while 40% completely disagreed with this proposition. In 2019, in order to track whether long-term sentiment was on an upward or downward trend, respondents were asked whether businesses have become more willing over the previous 10 years to mis-state financial statements in order to cover up fraud (Figure 1.1). The proportion of respondents who claimed that mis-statements were more likely was

26%, while 50% completely disagreed, representing similar proportional growth in each group of respondents committing to a specific answer, with the population who thought that there had been no change contracting sharply (to 24% from 41%). These results are in stark contrast to the global position, which showed a sharp increase in the number who claimed businesses would be willing to misrepresent their results.

In 2013, concern was expressed that UK SMEs were not considering bribery as regularly as they should. Fewer than half (43%) of respondents believed bribery risk to be routinely considered by SMEs when contemplating doing business internationally, and just 30% thought this happened when UK SMEs were considering doing business within certain sectors. The 2019 figures, however, show a marked increase in business wariness,



[Bribery and corruption] excludes them [SMEs] from obtaining contracts, or [creates] delays in being paid. Examples would include buyers expecting hospitality that SMEs cannot afford. I have also heard of payments being requested to be paid on time [and] contracts only awarded to co-members of secretive 'networking' organisations.

Respondent, England

In the current economic climate where many SMEs are struggling, there is a much greater temptation.

Respondent, Northern Ireland

Often SMEs may use intermediaries to assist in opening new markets. This exposes them to risks that they are not aware of and in four of the cases I have come across it was the acts of the intermediaries which caused the exposure.

Respondent, England

Negotiating contracts with different countries and cultures, it can be difficult to pick up on hidden corruption.

Respondent, Scotland

‘Many SMEs think internationally in terms of trade in order to grow but cannot compete against larger business with facilitation payments and some rule out entire countries due to risk as the UK’s anti bribery laws are very stringent.’

Respondent, England

with sector risk a concern to 53% of respondents, and international trade prompting consideration of the risks in 71% of cases.

In order to target their efforts successfully, businesses will need to understand where the risk is most likely to arise (Figure 1.2). Fewer than 50% of respondents who expressed an opinion claimed that bribery was likely to arise in any of the scenarios presented, representing a reduction in the perceived risk since 2007 across all areas surveyed. While the fall in likelihood of risk in cross-border trade or dealing

with public officials has been consistent, however, the perception of likelihood has risen both in private sector dealings (from 32% to 36%) and from supply chain pressures (41% to 48%) (Figure 1.2).

However they encounter it, bribery and corruption is seen as a problem for those trying to operate in the business world. Over two-thirds (68%) of UK respondents think SMEs see bribery and corruption as having a negative impact on the business environment, up from 64% in 2013 (Figure 1.1); only 12% do not, a figure which has remained steady.



As SMEs start to trade internationally, their employees could come under threat of bribery and corruption. In some countries it is almost an expected norm.

Respondent, England

There is not enough exposure to the existence of this. People see corruption in local councils and think if it’s okay for the government, then it’s okay for all.

Respondent, England

FIGURE 1.1: Respondents’ perceptions of SMEs’ approach to bribery and corruption issues

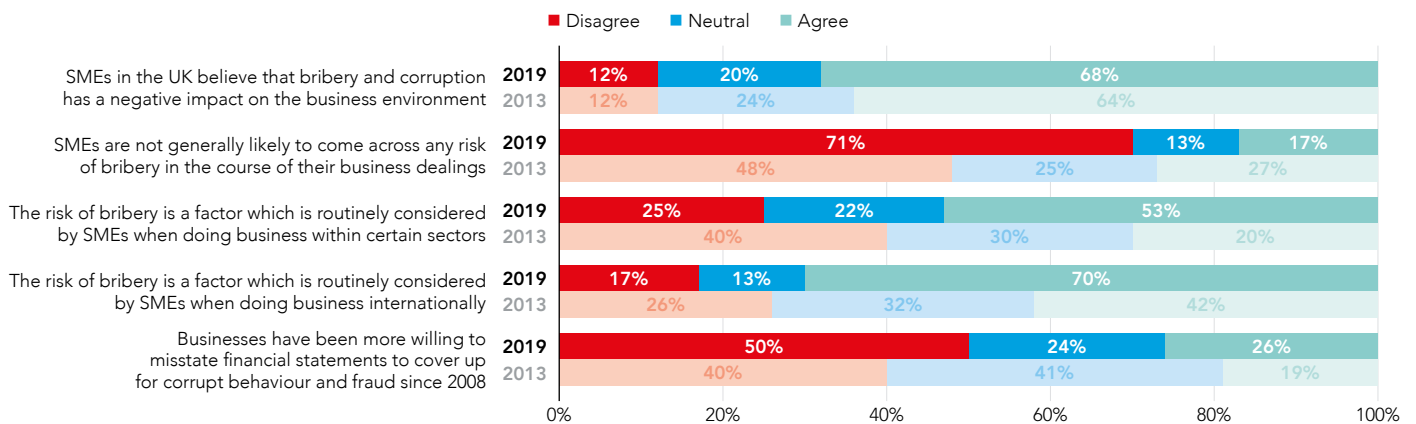
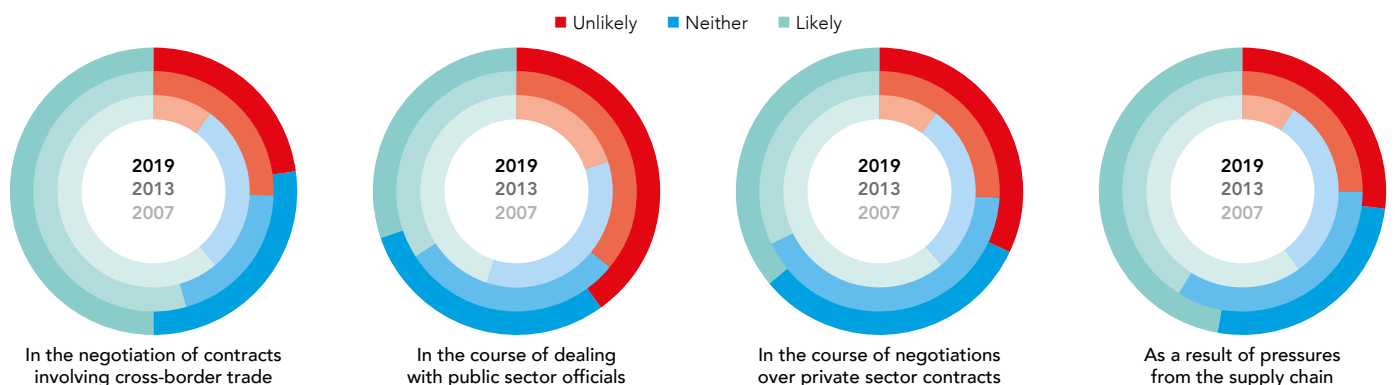


FIGURE 1.2: Respondents’ perceptions of circumstances where bribery and corruption might arise



2. Understanding of bribery and corruption issues



SMEs may know they are exposed to bribery and corruption risks, but can they reliably spot them? In many instances, corrupt payments are hidden behind the veneer of acceptable business expenses.

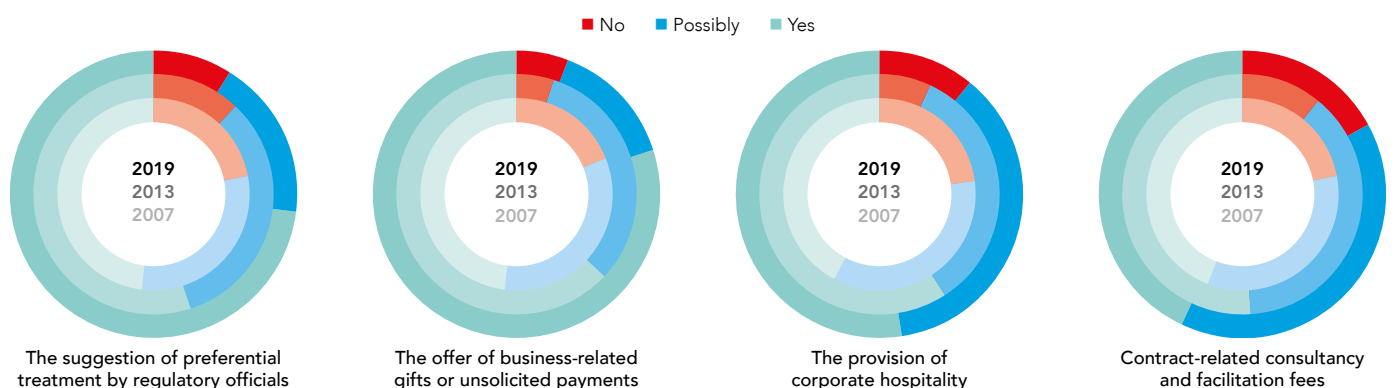
A business expanding into a new and unfamiliar market might quite legitimately, and indeed sensibly, appoint a local agent or intermediary to guide it through local regulation and business custom, yet such arrangements can also mask the bribery of public officials or be used to channel illicit payments. A meal after a meeting may be no more than common politeness, but how lavish could it be before reaching the tipping point where

undue influence is apparent? Tips and gratuities are not generally considered to fall within the definition of bribery, but what of the case where a regular customer consistently over-tips and then starts to demand special treatment?

Respondents are most confident about SMEs' ability to distinguish between bribery and corruption and the offer of small business-related gifts or unsolicited

payments; of those able to express a view, 80% believe SMEs could do this, a proportion which has risen consistently over the survey periods. Similarly, 73% consider that SMEs would be able to distinguish between bribery and corruption and legally obtained preferential treatment by regulatory officials. The picture is more mixed for corporate hospitality and contract-related fees, with far larger proportions of the

FIGURE 2.1: Which of the following would you expect SMEs to distinguish from unacceptable bribery and corruption?

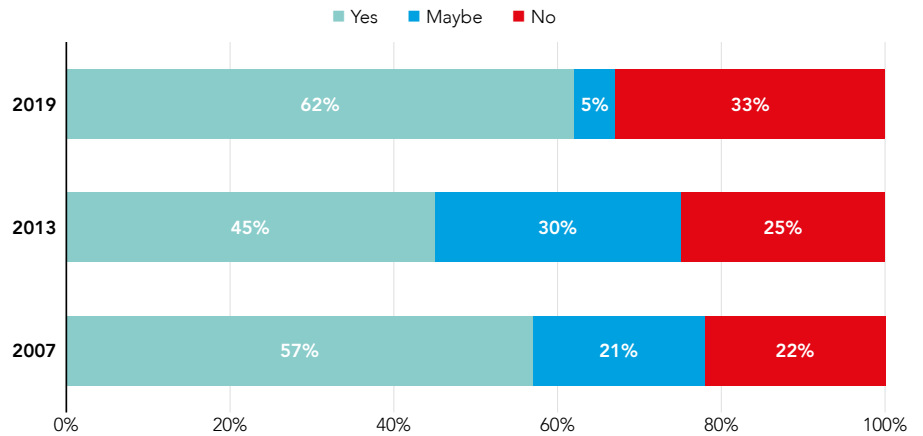


62%
of respondents in 2019 think that SMEs generally understand the legal definition of bribery and corruption

respondent population less certain that they could definitely draw the line. A small majority (53%) believe SMEs could definitely distinguish between legitimate corporate hospitality and entertainment and bribery and corruption, but a sizeable minority, 37% thought only that they could 'probably' tell the difference. For contract-related consultancy or facilitation fees, very nearly as many respondents, 40% were uncertain as thought SMEs could reliably distinguish illegal payments (43%), with 17% (the highest for any scenario) believing that SMEs would not be able to tell the difference.

Respondents' opinion of the SME community's understanding of the legal definition of bribery and corruption has polarised, with 62% thinking that SMEs generally understand the definition, and 33% thinking they do not, with only 5% unsure. Fewer than half (45%) of UK respondents in 2013 agreed that SMEs generally understand this definition (Figure 2.2), compared with 57% in 2007. Equally, in 2013, one-quarter (25%) of respondents thought SMEs did not understand the legal definition of bribery and corruption (22% in 2007).

FIGURE 2.2: The proportion of SMEs that understand the legal definition of 'bribery'



3. The legal framework



At the time of the 2013 survey, the UK’s Bribery Act 2010 had comparatively recently come into force, revising the existing offences related to giving and accepting bribes, and introducing the new corporate offence of failing to prevent acts of bribery being committed by employees, agents or subsidiaries.

Despite the publicity surrounding the new legislation, and campaigns to try to raise awareness, the survey results indicated disappointing results. There seemed to be little confidence in the legislation, and very similar levels of awareness of common elements as had been observed in 2007.

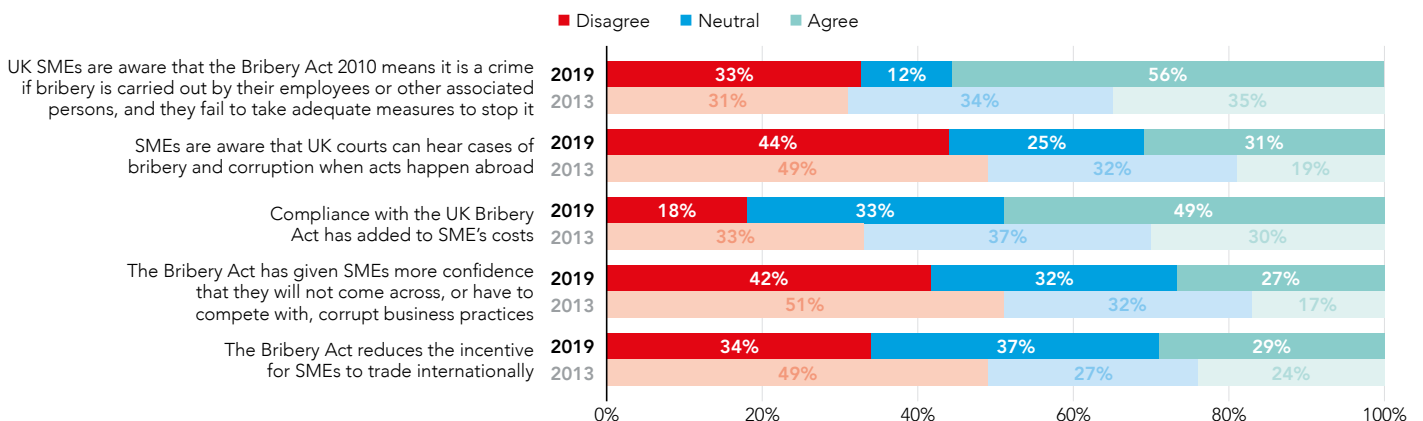
Almost half (49%) of respondents in 2013 did not think that SMEs were aware that UK law enables courts to hear cases of

“ I think a lot of SMEs are unaware of it or think it will not apply to them.
Respondent, England
 Very few SME clients are aware the anti-corruption laws exist.
Respondent, England ”

bribery and corruption even where the alleged acts are committed abroad – a very similar proportion of respondents as held this view in 2007 (51%).

The 2019 results show little improvement on those results, with 44% of respondents believing that UK SMEs are still unaware of the UK courts’ jurisdiction over offences committed overseas.

FIGURE 3.1: Respondents’ perceptions of the impact of the 2010 Bribery Act



46%
of respondents in 2019 do not think SMEs are deterred by the risk of sanctions under anti-bribery laws, up from 31% in 2013

Many in the SME community remain sceptical about the Bribery Act's impact (Figure 3.1), although views are improving. Only 27% (2013: 17%) of respondents think that the Act has given SMEs more confidence that they will not encounter, or have to compete with, corrupt business practices. A far larger proportion, 42% (2013: 51%) think that it has not. In fact, 29% of respondents think that the Bribery Act has reduced the incentive for SMEs to trade internationally, up from 24% in 2013. The percentage of respondents disagreeing with that proposition has fallen from 49% to 34%.

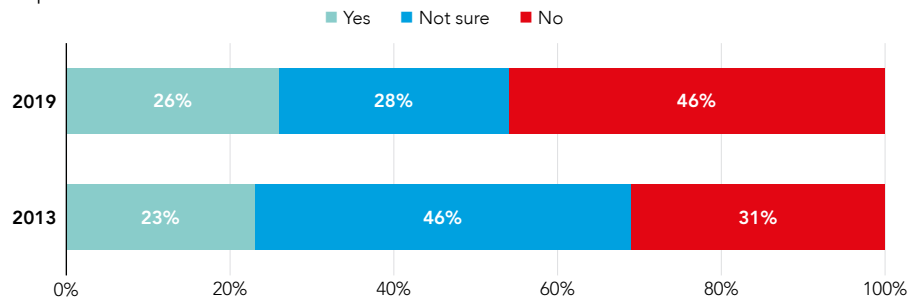
In 2013, respondents were divided in their views on whether compliance with the Act had added to SMEs' costs: 30% thinking it had, while 33% thought it had not. That position has been clarified, with just 18% still thinking it has not added to costs, against 49% who think it has added

to costs. This finding may relate to the one area where understanding has increased since 2013 – awareness that it is a crime if bribery is carried out by an SME's employees or other associated persons, and the firm fails to take adequate measures to stop it. In 2019, 56% of respondents were confident of SMEs' awareness, up from 33% in 2013. Taking such measures is likely to incur some level of cost.

Survey respondents were also asked whether they think SMEs are deterred from doing business within some sectors or jurisdictions because of the risk of sanctions under anti-bribery laws. The proportion believing this to be the case has risen slightly, from 23% (2013) to 26%, while the proportion who were unsure has fallen from 46% (2013) to 28%. Nearly half, 46%, do not think SMEs are deterred, up from 31% in 2013. (See Figure 3.2)

“ Small businesses generally endeavour to comply with regulation and often buy in to good practice. However, limited resources make it very difficult to be aware of everything needed for compliance and to implement best practice.
Respondent, England
Many SMEs find the volume of rules and regulations to which they are subject a drain on their time and their resources.
Respondent, England

FIGURE 3.2: Respondents' perceptions of the deterrence effect of bribery and corruption sanctions



58%

of respondents in 2019 do not support modified anti-bribery and corruption legislation for SMEs

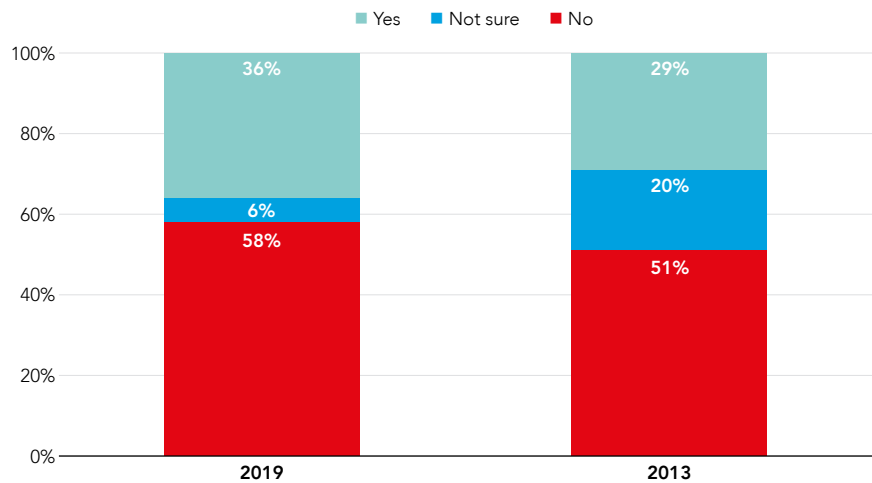


SMEs may feel the need to go along with bribery and corruption, otherwise they may find themselves at a disadvantage in their markets. They may regard the risk of penalties to be minor in comparison with any advantage they may gain.

Respondent, England

Should anti-bribery laws incorporate a modified regime for SMEs, involving less strict compliance obligations than those applying to large companies and public bodies? The largest proportion of survey respondents 58% (2013: 51%; Figure 3.3) do not think so, seeing value in maintaining one framework for all businesses, regardless of size. Nevertheless, 36% (2013: 29%) would like to see a modified SME regime. Of those supporting this idea, 34% (2013: 37%) think that rules prohibiting the solicitation or payment of facilitation payments should be relaxed for SMEs. While 12% (2013: 32%) are unsure, a majority, 54% (2013: 31%) do not want these rules to be relaxed for SMEs.

FIGURE 3.3: Respondents' support for modified anti-bribery and corruption legislation for SMEs



4. Advice and guidance



When asked to whom SMEs are most likely to turn if faced with a bribery and corruption issue, equal proportions of respondents identify their lawyer, 30% (2013: 44%, 2007: 42%) and their accountant, 30% (2013: 28%, 2007: 29%) (Figure 4.1).

In the 2019 survey, 11% thought SMEs would turn to other professionals, the same proportion who thought they would turn to a business organisation or professional or trade body, 7% thought they would contact a confidential advisory service, and just 2% suggested the police.

Given the legal frameworks around bribery and corruption, the reliance on lawyers is unsurprising, although the decline in their popularity is striking. SMEs value practising accountants for their all-round business support services,

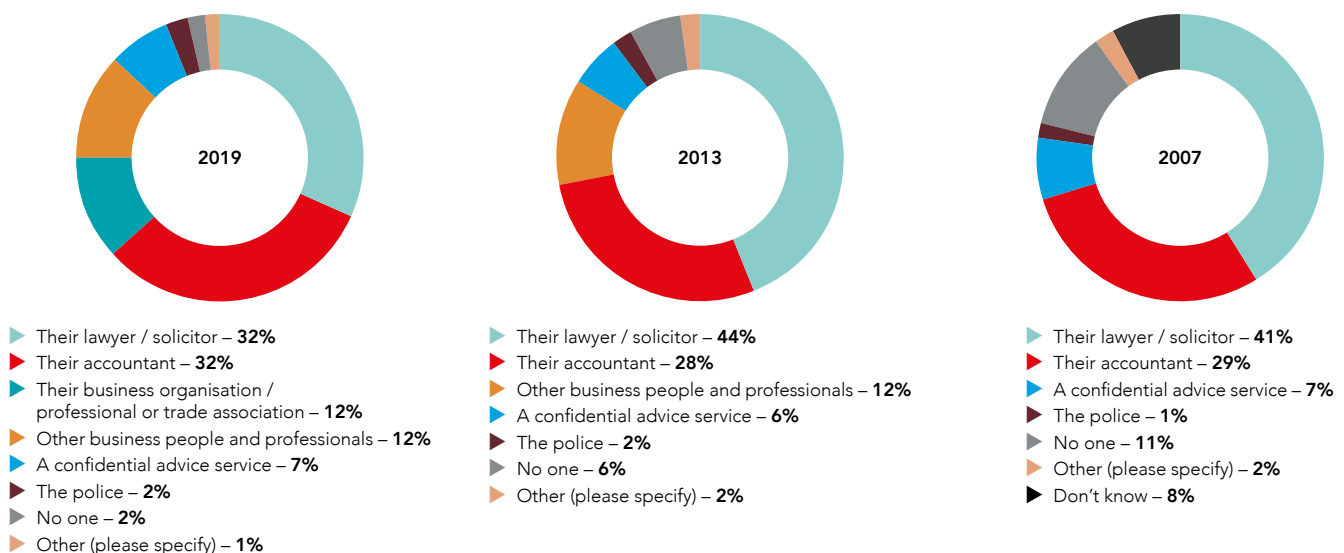
and clearly perceive their expertise as encompassing bribery and corruption issues. They may, for example, look to their accountant to provide advice on appropriate policies and practices for reducing their bribery and corruption risks. This creates an opportunity for accountancy professionals to strengthen client relationships by developing their skills and expertise to meet SMEs' needs in this area. This is confirmed by the survey findings. Nearly three-quarters, 72% (2013: 75%) of survey respondents suggested that SMEs would welcome advice from their accountants on the



It is a concern because where it arises and the SME reports it, the SME suffers greatly due to the approach that the police take.

Respondent, Wales

FIGURE 4.1: Respondents' views on sources of advice for SMEs



66%
of respondents in 2019 do not think there is sufficient guidance for SMEs, up from 49% in 2013

policies and practices they need to put in place to deal with the risk of encountering bribery and corruption.

Survey respondents see a range of benefits for SMEs that demonstrate strong anti-bribery credentials. Among respondents, 84% (2013: 75%) think this will help to ensure that the business does not breach legal requirements or give rise to reporting obligations by third parties. In addition, 72% (2013: 70%) think it will enhance the firm’s reputation for high standards of business conduct, and 67% (2013: 58%) anticipated enhanced consumer confidence in the business.

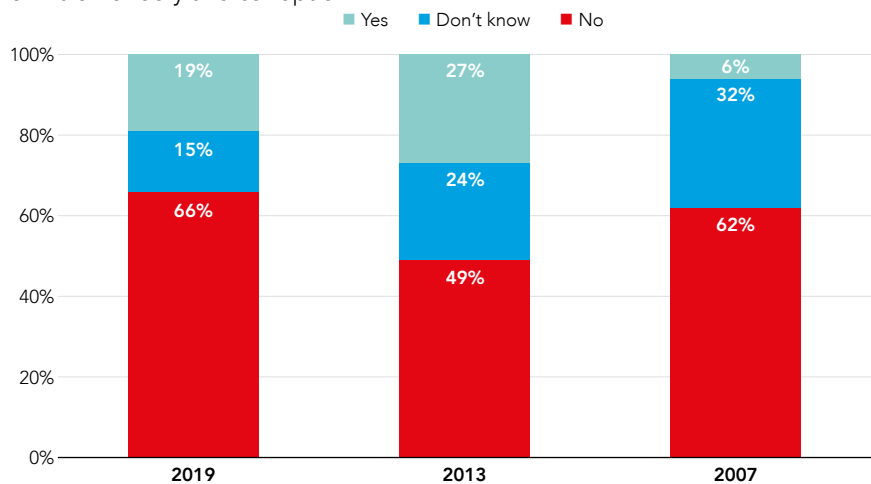
Over half, 55% (2013: 48%), argue that an SME demonstrating strong anti-bribery credentials will be more likely to be able to trade with large businesses and public bodies. Nonetheless, 46% (2013: 32%) think it will cost SMEs business.

Satisfaction with the available guidance for SMEs has fallen back to 19%, compared with 27% in 2013, and 6% in 2007 (Figure 4.2). Among the 2019 respondents, 66% do not think there is sufficient guidance for SMEs, up from 49% in 2013 and 16% (2013: 24%) do not know, suggesting they may not be aware of the guidance that does currently exist.

“ [Encountering bribery and corruption] can be shocking when this happens the first time. Employees negotiating on behalf of companies need awareness courses and more important how to deal with this.
Respondent, England

The risks of the Bribery Act 2010 are not well known in SMEs, and so procedures and policies and risk assessments are not always in place, to help and guide the management and the employees, neither is the whole area sponsored by senior management. So simple guidelines would be a useful tool, so that this area is taken seriously, particularly in the high tech arena.
Respondent, England

FIGURE 4.2: Respondents’ perceptions of the availability of suitable guidance for SMEs on bribery and corruption





5. Combating bribery and corruption

If bribery and corruption risk is an issue for the SME community, what actions could be taken to reduce that risk or help SMEs address it?

Survey participants were asked to rate the effectiveness of a number of options on a scale from one to five. The results show most importance being placed on the development of guidance from professional and trade associations, 55% expecting this to be among the most highly effective measures. Half the respondents also see benefits from the creation of an environment where concerns about possible bribery and corruption can come to light, while half give a high effectiveness rating to laws granting whistle-blowing rights to

“ Anonymous routes to report bribery and corruption would be very beneficial. Respondent England

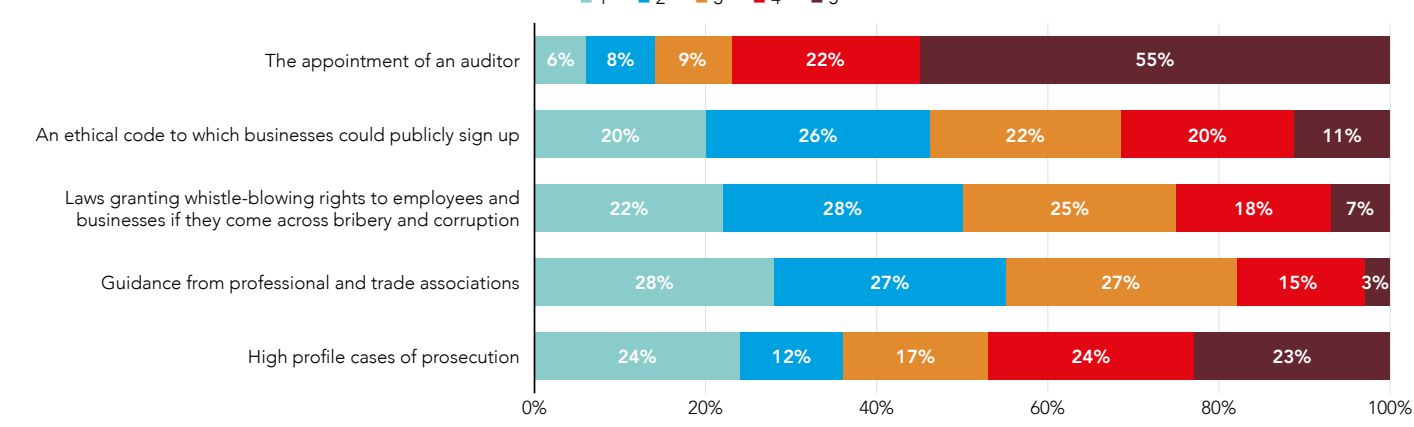
employees and businesses where they encounter instances of bribery and corruption (Figure 5.1).

The existence of an ethical code to which businesses could publicly sign up is also

thought to be an effective measure (44%). This is consistent with the earlier finding (Figure 5.2) that the majority (66%) of respondents do not think there is currently sufficient guidance to help SMEs in identifying and dealing with bribery and corruption.

One clear shift from the 2013 survey results is in attitudes to high-profile prosecutions. Although changes in methodology prevent a direct comparison, 71% of respondents to that survey said that creating an environment

FIGURE 5.1: Respondents’ perceptions of the effectiveness of different measures in helping SMEs deal with bribery and corruption (Comparative figures)



Many perceive it as a particular risk when trading abroad, while others highlight the challenges that SMEs face in understanding the legal requirements in connection with bribery and corruption.

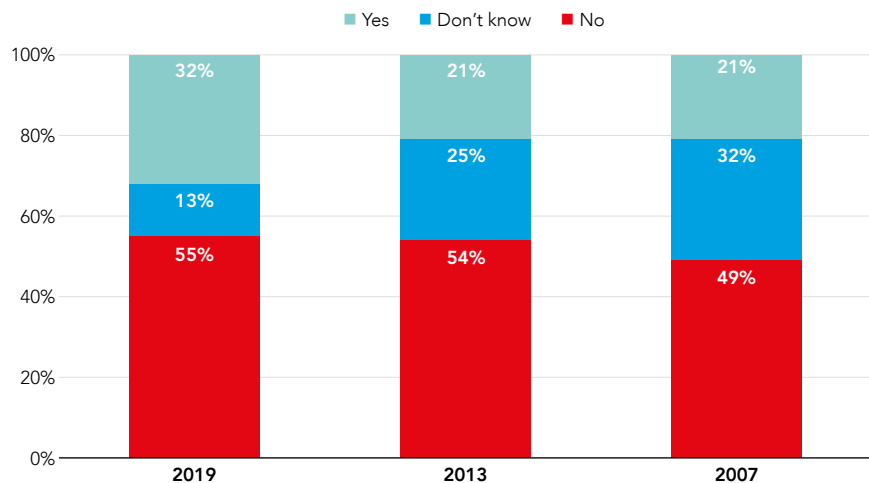
where it is clear that illegal activity will not be tolerated would be highly effective, the highest proportion for any of the measures. Only 2% rated such measures as being ineffective. Yet in 2019, 23% claimed that high-profile prosecutions would be the least effective measure; only the appointment of an auditor was reckoned less effective. The conclusion in 2013 was that high-profile prosecutions would send a strong message that laws will be acted upon, encouraging more businesses to take the adoption and application of their anti-bribery policies and procedures seriously. The declining confidence in the effectiveness of such measures is disappointing, perhaps reflecting a resignation on the part of respondents that although many such high-profile prosecutions have taken place, bribery and corruption still seems rife. It may, however, also reflect a growing awareness of non-trial resolution mechanisms such as Deferred Prosecution Agreements.

The measures considered to be least effective by survey respondents is the appointment of an auditor, ranked by 55% as the least effective alternative. This was also considered to be the least effective measure in the 2013 and 2007 surveys.

Asked whether, in general, bribery and corruption is a cause of concern for SMEs, 55% (2013 54%) of respondents expressed the view that it is not (49% in 2007). Nevertheless, in 2019 31% say that it is, up from 21% in both the 2013 and 2007 surveys.

Survey respondents give many reasons for why bribery and corruption is a concern for SMEs, including the loss of a 'level playing field' when competing for business, the increased costs that can result, and the risk of losing business if refusing, for example, to make facilitation payments. Many perceive it as a particular risk when trading abroad, while others highlight the challenges that SMEs face in understanding the legal requirements in connection with bribery and corruption.

FIGURE 5.2: Is bribery and corruption in general a concern for SMEs?





Conclusions

Although the UK business environment has evolved significantly since 2007, bribery and corruption remains an issue for SMEs. They are at risk, particularly if trading internationally, and may not have the awareness and the policies and procedures needed to protect themselves adequately.

More could be done to help SMEs. There could, for example, be a case for developing additional guidance or improving awareness of what already exists in this area. Enabling potential instances of bribery and corruption to come to light by protecting whistle-blowers is seen as important. For such mechanisms to be effective for SMEs will involve external action, as the businesses will often be too small for it to be realistic to set up 'hot lines' and the reporting mechanisms that are developed within larger businesses.

The perceived additional cost burden from compliance with the UK legislation is a concern. Anti-bribery guidance for SMEs needs to be short and accessible. Although many excellent free resources are available, for a smaller business the use of management time is an opportunity cost that translates directly into forgone sales and forgone profit, and hence lost growth opportunities.

Accountants remain a source of advice and support to the SME business community. When instances of potential law-breaking arise, accountants are seen as a key source of help. Their ability to advise on robust procedures and controls designed to counter the risk of bribery and corruption exposure is also valuable. Some accountancy practices may wish to consider developing greater expertise in this area in order to be able to provide appropriate support and services to their SME clients. By doing so they could further develop their role as trusted business advisers.

There is also a support role to play for governments and larger businesses in the supply chain. Access to whistleblowing mechanisms will rely on their provision by better resourced correspondents, while the tone set by the biggest players in the market will influence the behaviour of all involved. Against a backdrop of damaged trust in business, visible and effective steps to counter bribery and corruption at every level have a vital role to play in fostering an ethical environment which supports and protects SMEs.



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