

Family:	Leadership and Management	REF: ARCST003
Policy title	Anti-Bribery Statement	
Version:	3	
Policy owner:	Company Director	
Policy author:	Quality Manager	
Date of Review	21.07.2020	
Next review date	01.07.2021	
Applies to:	All staff	
Related policies:	Disciplinary Policy. Complaints Procedure Equality & Diversity Public Interest Disclosure Policy	

Statement Aim

ARC Group is committed to upholding its reputation and integrity and identifies the importance of how derogatory any involvement in bribery or corruption.

In order to limit its potential exposure, ARC will:

- Set out a clear anti-bribery statement
- Ensure there is a clear Public Interest Disclosure (whistleblowing) policy in place
- Train all employees so that they can recognise and avoid the use of bribery themselves and educate others.
- Encourage employees to be vigilant and to report any suspicion of bribery and provide them with the ways and means to communicate this information to the directors of the company, without fear of repercussion.
- Investigate any instance of alleged bribery and co-operate fully with the police.
- Not allow any political contributions to be made by the company.
- Ensure that any individuals found guilty of such breaches are dealt with accordingly.

Definition of Bribery:

“The offering, promising, giving, receiving or soliciting of something of value for the purpose of influencing the action of any individual in the discharge of their duties.”

The company prohibits: The offering, the giving, the solicitation, or the acceptance of any bribe whether cash or other inducement.

To or from: Any person or company, wherever they are situated and whether they are a public official or body or private person or company.

By: Any individual employee, agent or other person or body acting on the company’s behalf.

In order to: Gain any personal advantage, financial or otherwise for the individual or anyone connected with the individual.

The company re-iterates that this statement prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them and which is intended to influence them to take action which

may or may not be solely in the interests of the company or of the person or body employing them or whom they represent.

It is not the intention of this statement to prohibit the following practices providing they are customary within the industry, are proportionate and are properly recorded in writing.

- Normal and appropriate hospitality at organised client networking events
- The giving of a ceremonial gift, i.e. length of service/anniversary/achievement/award.
- The use of any recognised fast track process which is available to all on payment of a fee.
- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.
- Donations to charities will only be permitted by the Directors prior written consent and record.

Decisions as to what is acceptable may not always be easy. It is therefore company policy to seek clarification from the Directors prior to any action being taken.

Responsibilities

The Managing and Operational Director will ensure that any instance of bribery is identified within Arc Group and dealt with by taking appropriate remedial action immediately.

Employee Responsibility

Arc Group employees and contractors are encouraged to raise concerns about any instance of malpractice at the earliest possible stage in total confidence to their immediate manager/supervisor.

The prevention, detection and reporting of bribery is the responsibility of all employees



All reported instances of alleged bribery will be dealt with in the strictest confidence and if you prefer, and the law permits, you can report anonymously.

Disciplinary Action

Bribery is a criminal offence which may lead to criminal penalties and will be considered gross misconduct

Statement of Commitment

The Company will not tolerate any form of bribery or corruption. This policy demonstrates its approach to bribery and corruption. The policy will be regularly reviewed and updated as and when necessary. Arc Group will uphold laws relevant to countering bribery in all circumstances and in particular will comply with the Bribery Act 2010.

Signed		Dated	21.07.2020
Managing Director			
Signed		Dated	21.07.2020
Operations Director			