

## The Bribery Act 2010 Notice

The Bribery Act makes it clear that bribery is illegal. This is the case whether you are bribing or being bribed. Very generally, bribery is defined as giving someone financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

## **Some Key Points**

You are strictly prohibited from giving or receiving bribes whether in the UK or abroad.

Under no circumstances are you permitted to bribe a third party to obtain or retain business or a business advantage for this Company. The prohibition on bribery includes bribing a foreign public official. It is important to remember that both you and the Company can be liable to prosecution for bribery offences.

The Company can still be found liable for a bribery offence even if an act of bribery is committed by a person who is not an employee of this company – that is an associated person. Associated persons are also strictly prohibited from bribing others to obtain or retain business or a business advantage for this Company.

We can still provide hospitality and gifts to third parties provided they are reasonable, proportionate and appropriate in the circumstances. A record must be kept of all hospitality and gifts.

ARC:MC Ltd is committed to stamping out any level of bribery that may occur. This includes bribing or being bribed.

An act by an individual staff member involving the offering, giving or receiving of bribes or breach of the Company's anti-bribery procedures will be subject to appropriate action up to and including summary dismissal.

Reference to the Bribery Act 2010 is included in the Employee Handbook.

Further information and guidance, if required is available on request from me.

Managing Director 04/01/2023

Masken Jam.

04/01/2023

