



# The Archdiocese of Liverpool

## Bribery Act Statement

The Archdiocese is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on the Archdiocese's behalf is responsible for maintaining the organisation's reputation and for conducting its work honestly, professionally and with complete integrity.

The Archdiocese benefits from carrying out its objectives in a transparent and ethical way. This help to ensure that there is honest, open and fair treatment of all. Transparent, fair conduct helps to foster relationships of trust between the Archdiocese and all those with whom it has dealings and is vital to maintain its reputation.

The Archdiocese considers that bribery and corruption has a detrimental impact on the proper management of any business and undermines good governance. A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

The Archdiocese does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents, contractors or consultants or any persons or companies acting for it or on its behalf. The trustees and senior management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

The Archdiocese is in the process of formulating a new anti-bribery policy outlining its position on preventing and prohibiting bribery. The anti-bribery policy applies to all employees, including those of any subsidiary, as well as agency workers, consultants and contractors. All employees and other individuals acting for the Archdiocese are required to familiarise themselves and comply with its anti-bribery policy with immediate effect. A breach of the Archdiocese's anti-bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal. Employees and other individuals acting for the Archdiocese should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the organisation.

The Archdiocese will not conduct business with service providers, agents or representatives who do not support its anti-bribery objectives and reserves the right to terminate its contractual arrangements with any third parties acting for, or on behalf of, the Archdiocese with immediate effect where there is evidence that they have committed acts of bribery.

The success of the Archdiocese's anti-bribery measures depends on all employees, and those acting for the organisation, playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, the Archdiocese are encouraged to report any suspected bribery in accordance with the procedures set out in the anti-bribery policy. The Archdiocese will support any individuals who make such a report, provided that it is made in good faith.

Rev Sean Kirwin  
Episcopal Vicar for Finance and Development