

<b>Family:</b>	<b>Leadership and Management</b>	<b>REF: ARCST012</b>
<b>Policy title</b>	Criminal Finance Act 2017 Statement	
<b>Version:</b>	1	
<b>Policy owner:</b>	Managing Director	
<b>Policy author:</b>	Operations Director	
<b>Date of Review</b>	01/08/2022	
<b>Next review date</b>	01/08/2023	
<b>Applies to:</b>	All staff	
<b>Related policies:</b>	Disciplinary Policy. Anti-Bribery Policy Criminal Finance Act 2017 Policy Public Interest Disclosure Policy	

ARC Group has a nominated key officer responsible for the information and queries on CFA within our organisation – the key officer for CFA 2017 is the Director of Finance

The Group Operations Director is responsible for supply chain transparency and initiatives.



Training and awareness sessions will be undertaken for all Finance staff and where ARC identifies CFA2017 specific risks it will undertake bespoke training and awareness sessions.

ARC Group regularly reviews its risks and associated processes and procedures to ensure all steps are taken to prevent facilitation of tax evasion.

ARC Group regularly review guidance and legislation (at least annually) in relations to CFA 2017 to ensure it is maintaining an appropriate CFA 2017 policy.

ARC Group maintains a register of possible risks of the facilitation of tax evasion by its staff and associates (including agents, contractors and suppliers), as well as listing controls to mitigate those risks, and any actions required to improve these controls. The register is regularly reviewed and updated, as and when required in relation to the nature of the specific risks.

Appropriate due diligence will be undertaken on both customers of and suppliers to ARC Group and its subsidiary companies. This due diligence will be proportionate to the level of perceived risk of the interaction being used to engage in the criminal facilitation of tax evasion.

Signed		Dated	01.08.2022
<b>Managing Director</b>			
Signed		Dated	01.08.2022
<b>Operations Director</b>			