



Anti-Bribery & Corruption Policy

1. Introduction C.T Production Ltd. is committed to conducting business with integrity and in accordance with all applicable laws and regulations. This Anti-Bribery and Corruption Policy sets out the Company's principles and procedures for preventing bribery and corruption in all its forms.

2. Scope This policy applies to all employees, directors, officers, agents, contractors, consultants, and any other individuals or entities acting on behalf of C.T Production Ltd, regardless of location.

3. Legal Framework This policy is designed to comply with the UK Bribery Act 2010 and other relevant legislation. The Act makes it a criminal offence to:

- Offer, promise, or give a bribe.
- Request, agree to receive, or accept a bribe.
- Bribe a foreign public official.
- Fail to prevent bribery by associated persons to obtain or retain business or a business advantage for the Company.

4. Policy Statement C.T Production Ltd has a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships.

5. Definitions:

- **Bribe:** A bribe is an inducement or reward offered, promised, or provided to gain any commercial, contractual, regulatory, or personal advantage.
- **Corruption:** Corruption is the abuse of entrusted power for private gain.
- **Facilitation Payments:** Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.

6. Prohibited Conduct:

- **Bribery and Corruption.** Employees or associated persons working on our behalf must not offer, promise, give, request, agree to receive, or accept any bribe, whether directly or indirectly.
- **Facilitation Payments.** C.T Production Ltd does not make, and will not accept, facilitation payments of any kind, including reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.
- **Gifts and Hospitality**
We realise that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry. It does not constitute bribery where the giving or receiving of gifts and hospitality is:
 - Appropriate and reasonable.
 - For the purpose of establishing or maintaining good business relationships.



- Not made with the intention of influencing the recipient improperly.
- Not in lieu of awarding special privileges.

7. Responsibilities:

Management Responsibilities

- The Board of Directors has overall responsibility for ensuring compliance with this policy.
- Managers at all levels are responsible for implementing this policy and ensuring that employees understand and comply with it.

Employee Responsibilities

- All employees must read, understand, and comply with this policy.
- Employees must immediately report any person or company that offers money, gifts or hospitality in return for favours.
- Employees are encouraged to report any concerns or suspicions of bribery or corruption to their manager or the HR department.
- You may be asked to give a written account of events.

8. Reporting Concerns:

- Employees are reminded of the Company's Whistleblowing Policy, available in the Employee Handbook.
- Reports will be treated confidentially and investigated promptly and thoroughly.

9. Training and Communication:

- C.T Production Ltd will train all employees where necessary on anti-bribery and corruption laws and this policy.
- This policy will be communicated to all employees, agents, contractors, suppliers, and business partners as appropriate.

10. Monitoring and Review:

- The Company will monitor the effectiveness of this policy to ensure it is in compliance with all relevant laws, considering its suitability, adequacy, and effectiveness. The company reserves the right to amend this policy without prior notice.

11. Consequences of Non-Compliance

- If we suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out, and, in line with our disciplinary procedure where appropriate, action may be taken against you, which could result in dismissal for gross misconduct.
- The Company may terminate its relationship with other individuals and organisations working on our behalf if they breach this policy.