

	Head Office: Brunel Way, Advanced Manufacturing Park, Rotherham, S60 5WG	QAF903	
		Date:	Jun 24
ANTI-BRIBERY, CORRUPTION and FRAUDULENT ACTIVITY		Iss. No:	02
		Iss. By:	NC

Castings Technology International Ltd (CTI) and do not tolerate any form of bribery, whether direct or indirect, by, or of, our employees, officers, agents or consultants or any persons or companies acting for us or on our behalf. The Board and Senior Management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

It is our policy to conduct all our business in an honest and ethical manner. We have a zero-tolerance approach to bribery, corruption and fraudulent activity, and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

We will uphold all laws relevant to countering bribery and corruption and remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct.

The purpose of this Policy is to:

- Set out our responsibilities in observing and upholding our position on bribery, corruption and fraudulent activity; and
- Provide information and guidance for our employees on how to recognise and deal with bribery, corruption and fraudulent activity issues.

Bribery, corruption and fraudulent activity are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

Definitions - In this Policy

“Third Party” means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties; and

“Compliance Manager” means the (SHEQ Director) and in his or her absence shall mean the (Managing Director).

This Policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with the company.

	Head Office: Brunel Way, Advanced Manufacturing Park, Rotherham, S60 5WG	QAF903	
		Date:	Jun 24
ANTI-BRIBERY, CORRUPTION and FRAUDULENT ACTIVITY		Iss. No:	02
		Iss. By:	NC

This Policy does not form part of any employee’s contract of employment, and we may amend it at any time.

The Board of Directors has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Business Assurance Director has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering bribery and corruption.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy.

A bribe is a financial or other inducement or reward offered, promised or provided for action which is illegal, unethical, a breach of trust or improper in any way, in order to gain any commercial, contractual, regulatory or personal advantage. Corruption is the abuse of entrusted power or position for private gain.

Fraudulent Activity is Deceit, trickery, dishonest practice, or breach of confidence, intentionally perpetrated for profit or to gain some unfair or dishonest advantage. This includes but is not limited to falsification of information, intentional omission, false pretences, and deliberate misuse of qualified resources or certification/qualification/authorization.

Compliance with this Policy:

This Policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties to maintain good business relationships, improve or maintain our image or reputation or market and present our services effectively.

Employees are, however, prohibited from accepting a gift from or giving a gift to a third party unless they have authorisation from Senior Management. Even if you receive this authorisation, the following requirements should still be met in respect of the gift:

- It should not be made or received with the intention of obtaining or retaining business or a business advantage or rewarding the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
- It should comply with local law.
- It should be given or received in our name, not in your name.
- It should not include cash or a cash equivalent (such as gift certificates or vouchers).

	Head Office: Brunel Way, Advanced Manufacturing Park, Rotherham, S60 5WG	QAF903	
		Date:	Jun 24
ANTI-BRIBERY, CORRUPTION and FRAUDULENT ACTIVITY		Iss. No:	02
		Iss. By:	NC

- It should be appropriate in the circumstances. For example, in the UK It is our policy for such gifts to be collected on a by office basis, raffled to employees at Christmas.
- Taking into account the reason for the gift, it should be of an appropriate type and value and given at an appropriate time.
- It should be given or received openly, not secretly; and Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the Compliance Manager.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

It is not acceptable for you (or someone on your behalf) to:

- Give, promise, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- Give, promise, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
- Accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for that individual or organisation.
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return.
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this Policy.

We do not make, and will not accept, "facilitation payments" or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK but are common in some other jurisdictions in which we operate. Kickbacks are typically payments made in return for a business favour or advantage. You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted.

	Head Office: Brunel Way, Advanced Manufacturing Park, Rotherham, S60 5WG	QAF903	
		Date:	Jun 24
ANTI-BRIBERY, CORRUPTION and FRAUDULENT ACTIVITY		Iss. No:	02
		Iss. By:	NC

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these in accordance with this Policy.

We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Compliance Manager.

Your Responsibilities under this Policy

You must ensure that you read, understand and comply with this Policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers (as defined above) are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

You must notify us as soon as possible using the reporting procedures outlined below if you believe or suspect that a conflict with this Policy has occurred or may occur in the future.

Any employee who breaches this Policy will face disciplinary action (refer to SP15E – Employee’s Handbook), which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this Policy.

You must declare and keep a written record of all hospitality, or gifts accepted or offered, which will be subject to managerial review. You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our Travel and Expenses Policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

Reporting Procedures:

You are encouraged to raise concerns about any issue or suspicion of bribery at the earliest possible stage with either your Line Manager or the Compliance Manager in the first instance.

However, if you are not comfortable reporting these concerns to either your Line Manager or the Compliance Manager, they can be brought to our attention using the alternative reporting procedures set out in the Public Interest Disclosure (Whistleblowing) Policy within the employee handbook.

	Head Office: Brunel Way, Advanced Manufacturing Park, Rotherham, S60 5WG	QAF903	
		Date:	Jun 24
ANTI-BRIBERY, CORRUPTION and FRAUDULENT ACTIVITY		Iss. No:	02
		Iss. By:	NC

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

If you believe that you have suffered any repercussions or detriment, you should inform Human Resources Department immediately. If the matter is not remedied, you should raise it formally using the Grievance Procedure.

An introduction to this Policy forms part of the induction process for all individuals who work for us and are expected to familiarise themselves with this Policy. Regular training will be provided, as necessary. Our zero-tolerance approach to bribery and corruption is communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter.

Complaint should be sent to:

Richard Cook
Managing Director
Castings Technology International Ltd
Advanced Manufacturing Park,
Brunel Way
Rotherham
S60 5WG
r.cook@castingstechnology.com

Signed: 

Dated: 26th June 2024

Name: Richard Cook.

Position: Managing Director.