

Anti-Bribery and Corruption Policy

General Information	
Title: Anti-Bribery and Corruption Policy	Contact Info: Chris Archer
ID: ABCP	Revision Number: 2
Issue Date: 05/01/2024	Expiry Date: 05/01/2025

Moncaster Wire Products Limited Anti-Bribery and Corruption Policy:

Anti-Bribery and Corruption Policy

Moncaster Wire Products Limited 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, wherever we operate.

Policy Statement

Employees and any third parties acting on behalf of Moncaster Wire Products must not give, offer, promise, receive or request bribes, including facilitation payments. They must also resist the solicitation of bribes to conceal or assist another in an act of bribery.

Bribery and corruption are punishable by up to ten years imprisonment and unlimited fines. If Moncaster Wire Products is discovered to have taken part in bribery or corruption, we could face prosecution, unlimited fines, and incalculable reputational damage.

Scope

This policy applies to all employees, contractors, suppliers and other third parties providing services to Moncaster Wire Products Limited. It covers bribes and kickbacks of any value, whether in cash or any other form of improper inducement.

Gifts and Hospitality

Employees must not offer, provide or accept gifts, hospitality or entertainment that could be viewed as an improper way to influence a business decision. Guidance on acceptable gifts and hospitality is provided in the company's Gifts and Hospitality Policy.

Facilitation Payments

Facilitation payments are bribes and are illegal under the UK Bribery Act. Moncaster Wire Products prohibits the making of facilitation payments anywhere in the world.

Charitable Donations

Charitable donations must be approved per the company's Charitable Donations Policy to ensure they are not used as a scheme to conceal bribery.

Political Contributions

Moncaster Wire Products does not make donations to political parties, organizations or individuals engaged in politics. Employees are free to make personal political donations but must not claim these as business expenses.

Moncaster Wire Products Ltd
Cavatorta group of Companies

Cavatorta House, Tattershall Way, Fairfield Industrial Estate Louth Lincolnshire LN11 0YZ

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Due Diligence

Appropriate due diligence must be conducted on all third parties before entering into business relationships to mitigate bribery risks.

Reporting Violations

Employees must report any suspected or actual violations of this policy through the company's whistleblowing channels. Moncaster Wire Products is committed to ensuring no employee suffers retaliation for refusing to pay bribes or reporting concerns in good faith.

Compliance with this policy is monitored and reviewed regularly by the company's Compliance Officer. Any employee who breaches this policy will face disciplinary action up to and including termination of employment.

General Information	
Signature:	
Name:	Chris Archer
Title:	Commercial Manager
Date:	05/01/2024

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