



ANTI-CORRUPTION AND BRIBERY POLICY

1. Policy Statement

At Viper Productions, we are committed to conducting business with honesty, integrity, and transparency. We operate a zero-tolerance approach to bribery, corruption, and unethical conduct in all forms—whether in the UK or abroad, and regardless of the size or nature of the transaction.

We are committed to upholding the principles of the UK Bribery Act 2010, and we expect the same high standards from everyone we work with, including freelancers, partners, suppliers, and clients.

2. Purpose of This Policy

The purpose of this policy is to:

- Define what bribery and corruption mean
- Set clear rules around gifts, hospitality and payments
- Provide guidance on how to raise concerns
- Ensure compliance with legal and ethical standards
- Protect the integrity of Viper Productions' work and reputation

3. Scope

This policy applies to:

- All employees, contractors, and freelancers
- Production partners, suppliers, agents and anyone working on behalf of Viper Productions
- All locations and projects, including international collaborations

4. What Is Bribery?

Bribery is offering, promising, giving, requesting, or accepting anything of value to gain a commercial, contractual, regulatory or personal advantage.

This includes:

- Cash payments
- Gifts or excessive hospitality
- Kickbacks or “facilitation” payments
- Unjustified discounts or benefits
- Favourable treatment or unfair influence in decision-making

5. What Is Not Acceptable?

You must never:

- Offer, give or accept bribes, whether directly or through a third party
- Make facilitation payments (small payments to speed up a process)

- Offer or receive gifts or cash that could be perceived as an attempt to influence a decision
- Ignore or fail to report suspicions of bribery or corruption
- Victimise or disadvantage anyone who raises concerns in good faith

6. Gifts & Hospitality

Viper Productions recognises that modest hospitality and gifts can be a part of normal business practice. However:

- Gifts must be appropriate, and not given with intent to influence
- All hospitality must be reasonable, proportionate, and transparent
- Any gifts or hospitality that raise concerns must be reported to a member of management

7. How to Report a Concern

If you suspect bribery or unethical behaviour:

- Report it to your line manager or the company director
- Send a confidential email to: karl@viperproductions.co.uk

Reports will be investigated discreetly and thoroughly. We will protect anyone who raises a concern in good faith from retaliation.

8. Breaches of the Policy

Any breach of this policy may result in:

- Disciplinary action, including contract termination
- Reporting to external authorities where appropriate
- Removal from future Viper projects and productions

9. Training & Awareness

Viper Productions will provide guidance and awareness on this policy to staff and collaborators where appropriate, especially those working in positions of financial or decision-making responsibility.

10. Review of Policy

This policy will be reviewed annually and updated if necessary to reflect changes in legislation, industry practice, or company operations.

This policy was approved by Viper Productions

Last reviewed: 22nd April 2025