



Anti-Corruption Policy

Purpose

This Anti-Corruption Policy ("Policy") establishes standards and procedures to ensure that Cablecraft Motion Controls (the "Company") conducts business ethically and in compliance with all applicable anti-corruption and anti-bribery laws. The Company is committed to integrity, transparency, and accountability in all its operations.

Scope

This Policy applies to all team members, officers, directors, temporary workers, contractors, consultants, agents, and any third parties acting on behalf of the Company (collectively, "Covered Persons").

Policy Statement

The Company has a zero-tolerance policy for bribery and corruption in any form. Covered Persons are prohibited from directly or indirectly offering, giving, soliciting, or receiving anything of value to improperly influence a business decision or secure an unfair advantage.

Compliance with Laws

The Company will comply with all applicable anti-corruption laws and regulations, including but not limited to:

The U.S. Foreign Corrupt Practices Act (FCPA)

The UK Bribery Act (as applicable)

Any local anti-corruption laws in jurisdictions where the Company operates

Prohibited Conduct

Covered Persons must not:

- Offer, promise, or give anything of value (cash, gifts, entertainment, travel, or other benefits) to any government official, customer, supplier, or third party to influence a decision or obtain an improper advantage
- Request or accept anything of value that could improperly influence decision-making
- Facilitate or make "facilitation payments" (small payments to expedite routine governmental actions), unless there is an imminent threat to health or safety
- Engage in any form of kickbacks, rebates, or undisclosed commissions



Government Officials

Special care must be taken when interacting with government officials. Any payment, gift, or benefit provided to a government official must be:

- Lawful under applicable regulations
- Reasonable and bona fide
- Pre-approved in writing by an executive officer of the Company

Gifts, Entertainment, and Hospitality

Reasonable and customary gifts and business entertainment may be permitted if they:

- Are modest in value (defined as \$50 or less)
- Are not intended to influence a business decision
- Are consistent with local laws and business practices
- Are properly recorded in the Company's books and records

Cash or cash equivalents (e.g., gift cards) are strictly prohibited.

Third-Party Relationships

The Company may be held liable for the actions of third parties acting on its behalf. Therefore:

- Due diligence must be conducted before engaging third parties
- Third parties must agree to comply with this Policy
- Payments to third parties must be reasonable, properly documented, and reflect legitimate services rendered

Books and Records

All transactions must be accurately recorded in the Company's books and records. False, misleading, or incomplete entries are strictly prohibited.

Reporting and Whistleblower Protection

Covered Persons are required to report any suspected violations of this Policy or applicable laws. Reports may be made to a supervisor, Human Resources, management or via email at compliance@cablecraft.com.



The Company prohibits retaliation against anyone who reports a concern in good faith.

Training and Communication

The Company will provide periodic training on anti-corruption compliance to relevant team members based on role and risk and ensure this Policy is communicated and accessible.

Enforcement and Discipline

Violations of this Policy may result in disciplinary action, up to and including termination of employment or contract, and potential legal consequences.

Exceptions

Any exceptions to this Policy must be approved in writing by an executive officer of the Company.

Policy Ownership and Review

This Policy is owned by the executive office and will be reviewed periodically to ensure continued effectiveness and compliance with applicable laws.