



JAMIE CALLAGHAN STUDIOS

Anti Corruption & Bribery Policy

	Name	Role	Signature
Prepared By	Jamie Callaghan	Director	
	Benjamin Twist	Assistant Manger	

	Name	Role	Signature
Approved By	Jamie Callaghan	Director	

POLICY LAST REVIEWED: April 2025

NEXT REVIEW: April 2026

POLICY INTRODUCTION:

Jamie Callaghan Studios is a multi-purpose creative company which is strongly committed to operating our business with transparency, openness and integrity – it remains firmly committed to operating a zero-tolerance approach to ANY forms of bribery, corruption & unethical conduct, whether in the UK or abroad & regardless of the size or nature of transactions.

This policy is shaped around the principles of the UK Bribery Act 2010.

SCOPE:

This policy applies to:

- All employees & volunteers working for or on behalf of Jamie Callaghan Studios
- All contractors working for or on behalf of Jamie Callaghan Studios

POLICY PURPOSE:

- To define what briber & corruption mean
- Set clear rules around gifts, hospitality & payments
- Provide clear guidance around how to raise concerns
- Ensure compliance with all legal and ethical standards
- Protect the integrity of Viper Productions work & reputation

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
- Favourable treatment or unfair influence in decision making

It is not acceptable to:

- Offer, give or accept bribes (whether directly or through a third party)
- Make facilitation payments (these are 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

GIFTS & HOSPITALITY

Whilst Jamie Callaghan Studios recognises that modest hospitality and gifts can be part of normal business practise and that most people will have no bad intentions when giving these out, however the following should apply:

- Gifts must be appropriate and not be given in an attempt to influence
- All hospitality must be reasonable, proportionate & transparent
- Any gifts or hospitality that raise any concerns (however small) must be reported to a member of management (more information below)

REPORTING CONCERNS:

Anyone with any concerns that bribery or unethical behaviour is taking place must report it by emailing either members of management:

Jamie Callaghan (Director):

jamiecallaghan@jcallaghanstudios.co.uk

Benjamin Twist (Assistant Manager):

benjamintwist@jcallaghanstudios.co.uk

All reports will be investigated discreetly and thoroughly, we will protect anyone who raises a concern in good faith from retaliation.

BREACHES OF THIS POLICY:

Anyone who breaches this policy may:

- Face disciplinary action (including dismissal)
- Be reported to external agencies & authorities if appropriate (such as the police)
- Be removed/blacklisted from future projects ran by Jamie Callaghan Studios

STAFF TRAINING:

Jamie Callaghan Studios will provide appropriate guidance and awareness of this policy to staff and volunteers working for or on behalf of Jamie Callaghan Studios – additionally this policy (and other associating policies) will be provided to new staff/volunteers as part of their induction package.