

## Crystal Health Group Policy

### Anti-Fraud, Bribery and Corruption Policy

|  <b>CRYSTAL</b><br>Health Group | Document name                                    | Version          |
|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|------------------|
|                                                                                                                    | <b>Anti-Fraud, Bribery and Corruption Policy</b> | <b>v03.01.26</b> |

## 1. Purpose

The Company recognises that fraud, bribery and corruption have an adverse effect on business and communities in which they operate in, and is committed to the prevention, deterrence and investigation of all forms of fraud, bribery and corruption. Failure to identify and act upon fraud, bribery or corruption can break laws and basic human freedoms, distorting free trade and competition.

## 2. Scope

Crystal Health Group Bribery and Corruption Policy applies to all employees, agency workers, consultants and contractors, irrespective of their level or functions they perform.

## 3. Responsibilities

- **Company Directors** – approve the policy and any significant updates.
- **Operations Manager** – oversees day-to-day application of the policy.
- **Employees & Contractors** – comply with this policy and its requirements.

## 4. Policy

### 4.1 Definitions

The Company definitions of fraud, bribery and corruption are below:

Fraud – is committed but any person, internal or external, to Crystal Health Group who by any deception dishonestly:

- Obtains property belonging to another, with the intention of depriving the other of it; or obtains for him or herself or another any pecuniary advantage
- Secures the remission of the whole or part of any existing liability to make a payment
- Obtains, or seeks to obtain, for him or herself or another, any pecuniary advantage with or without intent to cause loss to another by:
  - Destroying, defacing, concealing or falsifying any account of any record or document made or required for any accounting purpose; or
  - Furnishing any account, or any such record or document, which to his or her knowledge is or may be misleading, false or deceptive in a material particular
- “Internal Fraud”; fraudulent acts undertaken by Crystal Health employees; examples include falsification of expense claims, and falsification of invoices for payment.

Corruption - the offering, giving, soliciting or acceptance of an inducement or reward (including any gift, loan, fee or advantage) which may influence the action of any person; examples include a payment, favour or gift given to an employee of Crystal Health as a reward, or an incentive, that that person for any actions (or inactions) contrary to proper conduct of their duties;

Bribery – an inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage.

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## 4.2 Company Statement

Crystal Health Group will not tolerate any form of Bribery or Corruption and seeks to act with honesty and integrity in all of its business dealings. Crystal Health Group will immediately and thoroughly investigate any allegation of bribery or corruption and will take the strongest action. Breaches of the policy may be considered to be gross misconduct.

## 4.3 Laws and Regulations

Crystal Health Group is committed to applying high standards of honesty and integrity across our business. Our Bribery and Corruption Policy mirrors the statutory requirements applicable in the UK.

## 4.4 Policy and Practices

Crystal Health Group Bribery and Corruption Policy applies to all employees, agency workers, consultants and contractors, irrespective of their level or functions they perform.

Crystal Health Group expects our business partners, suppliers and contractors to act with utmost integrity and without actions or thoughts involving bribery and/or corruption.

## 4.5 Responsibilities

All employees, consultants, contractors, and agency workers; and any individual working directly for the business (including agents) are required and agree to operate within the following guidelines:

- To always act with honesty and integrity and support Crystal Health Group's policy relating to bribery and corruption
- Not to offer or make any bribe, outlandish or unauthorised payment or incentive of any kind to anyone.
- Not to solicit business by offering any bribe, unorthodox or unofficial payment to customers or potential customers
- Not to accept any kind of bribe, unorthodox or unusual payment or inducement that would not be authorised by Crystal Health Group in the ordinary course of business.
- To refuse any bribe or outlandish payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectations; and to report any such offers.
- Not to make facilitation payments. These are payments used by businesses or individuals to secure or accelerate a service or product. Crystal Health Group will not tolerate or overlook such payments being made.
- To report any breaches of the policy if you suspect Bribery or Corruption is occurring or has occurred previously or if you are unclear on procedures or your responsibilities.

## 4.6 What to do if you become aware or suspect there is breach of the policy

If you become aware of Bribery or Corruption occurring, you should report this to the

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Company Director(s) without delay. If you know or suspect they will not be able to act on the information impartially you should contact the Company Director(s). The information will then be collated and assessed.

Any breach of this policy by any employee will be considered as grounds for disciplinary action and may be considered to be gross misconduct. A breach by a contractor or consultant will be considered grounds to terminate any contract or agreement with that individual or Company. In the event of the discovery of Criminal behaviour, Crystal Health reserves the right to inform the police who may take the matter further.

## 4.7 Preventative Measures

As further preventative measures Crystal Health Group has set out the following guidelines:

- Any expenditure relating to gifts or entertainment must be authorised in advance by the Company Director(s)
- All gifts and gratuities must be declared by employees and employees must not receive any gifts or gratuities at their home address.

Gifts and gratuities include physical gifts; entertainment; corporate hospitality; vouchers; free or discounted goods or services; free or discounted use of facilities, property or any other items from suppliers, clients or other third parties.

## 5. Version Control

| Previous Version | Changes                                                                                                            | Last Effective Date | Reviewed and authorised by: |
|------------------|--------------------------------------------------------------------------------------------------------------------|---------------------|-----------------------------|
| v02.03.25        | <ul style="list-style-type: none"> <li>• Complete review and update by Objective HR</li> </ul>                     | 31/12/2025          | John McChrystal             |
| v01.01.22        | <ul style="list-style-type: none"> <li>• Full review and update in compliance with current legislation.</li> </ul> | 13/03/2025          | John McChrystal             |
| NEW              | N/A                                                                                                                | N/A                 | John McChrystal             |

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