


Crystal Health Group

# Anti-bribery policy

 <b>CRYSTAL</b> Health Group	Document name	Version
	Anti-bribery policy	v02.03.25

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### 1. Purpose

The purpose of this policy is to convey to all employees and interested parties of Crystal Health Group the rules of the Company in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Crystal Health Group conducts its business in a fair, professional and legal manner.

### 2. Scope

This policy applies to all employees of Crystal Health Group, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement. We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

### 3. Responsible Person(s)

The Policy Author is responsible for:

- Accuracy, version control and review dates.
- Implementation, training and operational compliance of this Policy.
- Initiating Policy change requests.


The QA representative is responsible for:

- Ensuring adherence to company Policy standards for authoring, content and structure.
- Resolution of Quality Incident reports arising from noncompliance of this Policy or external complaints.

Trained personnel are responsible for complying with all aspects of this Policy.

### 4. Health & Safety

All tasks and activities associated with this Policy comply with Crystal Health Group's Health & Safety Policy.

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## 5.1 Policy Statement

Bribery, in the context of the Company's business, refers to the offering or accepting of any gift, loan, payment, reward, or advantage for personal gain as an incentive to engage in dishonest, illegal, or unethical conduct.

Bribery is a criminal offence, and Crystal Health Group strictly prohibits any form of bribery. We expect full compliance with the highest ethical standards and all applicable anti-bribery laws from everyone associated with our business. Integrity and transparency are of utmost importance, and we maintain a zero-tolerance stance towards any corrupt activities, whether committed by employees or third parties acting on behalf of Crystal Health Group.

## 5.2 Legal Implications

Under the Bribery Act 2010, it is a criminal offence to:

- Offer a bribe
- Accept a bribe
- Bribe a foreign public official
- Fail, as a commercial organisation, to prevent bribery

Individuals found guilty of bribery could face up to 10 years in prison and/or an unlimited fine. The Company could also face corporate prosecution and be liable for substantial financial penalties.

## 5.3 Prohibited Conduct

It is strictly prohibited, directly or indirectly, to:

- Offer, give, request, or accept any form of bribe (i.e. gift, loan, payment, reward, or advantage), whether in cash or any other form of inducement.
- Engage in bribery to secure commercial, contractual, or regulatory advantages for the Company.
- Accept or offer bribes to gain personal benefits for yourself or anyone connected to you.
- Attempt to influence a foreign public official through payments or inducements.
- Make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe or solicited for one, do not agree to it unless your immediate safety is at risk. In such cases, report the incident to your manager or case manager as soon as possible. You may be required to provide a written account of events.


If you suspect bribery has occurred, even if you are not directly involved, you are expected to report it immediately to your manager or case manager. Failure to report such incidents may be considered a breach of this policy.

## 5.4 Compliance & Due Diligence

- Before engaging with suppliers, contractors, or business partners, the Company will conduct appropriate due diligence checks to mitigate bribery risks.
- All business transactions, sponsorships, and charitable donations must be conducted transparently and legitimately.

Crystal Health Group takes any suspected or actual breach of this policy extremely seriously and will conduct thorough investigations where necessary. Any confirmed instance of bribery will result in disciplinary action, including potential dismissal for employees or termination of contracts for third parties.

Employees are reminded of the Company's whistleblowing procedures, which can be accessed through the grievance policy upon request.

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## 5.5 Gifts & Hospitality Policy

Crystal Health Group acknowledges that reasonable gifts and hospitality can foster positive business relationships when given or received without expectation of undue influence. Such exchanges, when proportionate and properly recorded, do not constitute bribery and are not considered a breach of this policy.

### Definitions

- Gifts: Money, goods (e.g. flowers, vouchers, food, drink, event tickets not used in a hosted business context), services, or loans given or received as a mark of friendship or appreciation.
- Hospitality: Business-related entertainment, meals, or event tickets given or received with the host present to initiate or develop professional relationships. If the host is not present, hospitality is considered a gift.

### Approval & Record-Keeping

- No gift or hospitality may be offered or accepted by an employee or anyone acting on our behalf without prior written approval from the Director, John McChrystal.
- A record will be maintained for all instances where gifts or hospitality are given or received.

## 5.6 Policy Review & Updates

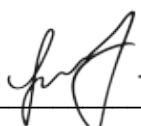
As legislation and regulations evolve, this policy will be regularly reviewed to ensure continued compliance with the Bribery Act 2010 and other relevant laws. Crystal Health Group reserves the right to amend this policy without prior notice.

## 6. Version Control


Previous Version	Changes	Last Effective Date
v01.01.22	<ul style="list-style-type: none"><li>• Full review and update in compliance with current legislation.</li></ul>	13/03/2025
NEW	<ul style="list-style-type: none"><li>• N/A</li></ul>	N/A

## 7. Authorisation

Name John McChrystal Position Director

Signed 

Date 13/03/2025

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