

## **Bribery Act Policy Statement**

### **Introduction**

The Bribery Act 2010 came into effect on 1<sup>st</sup> July 2011 in the UK (England, Scotland, Wales and Northern Ireland) and applies to all UK companies or businesses wherever the business is conducted or foreign organisations conducting business in the UK. The Act deals solely with Bribery and does not affect existing laws relating to fraud, theft, money laundering etc.

### **Definition**

Bribery is broadly defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

### **Offences**

The Act creates new offences of:

- Offering or receiving a bribe
- Bribery of foreign officials
- Failure to prevent a bribe being paid on an organisation's behalf

### **The Ministry of Justice Guidance**

There is a full defence where adequate procedures are in place to prevent bribery, but these need only be proportionate to the size and nature of the business. There are six principles which a company should consider to confirm adequacy:

- Proportionality of procedures to risk
- Top level commitment to culture of prevention
- Risk assessment of potential exposures
- Due diligence of third party service providers
- Communication of policy to all staff
- Monitoring and Review as business changes

Crystal Services Plc has considered these principles and taken action to ensure our compliance with the Act.

### **POLICY STATEMENT**

Crystal Services Plc does not condone any acts of bribery designed to benefit the company by employees or third parties acting on its behalf. The company does not employ bribery as a business practice and does not anticipate significant changes to business procedures under this policy. However, the company recognises the need to remain vigilant against risks in the future.

Prevention of bribery is a responsibility of all employees and associated persons of the company. Anyone who witnesses an act of bribery occurring or suspects an act of bribery must report the matter to the Chairman immediately.

Any employee failing to comply with this policy and guidance notes or associated policies will be subject to disciplinary action for gross misconduct.

Toby Jerman,  
Chairman for Crystal Services Plc