

## Crosby Straightpoint Bribery & Corruption Policy Statement

Crosby Straightpoint, part of Kito Crosby, recognises its obligations under the Bribery Act 2010, and is committed to implementing and enforcing effective systems to counter bribery and corruption. It is our policy to conduct all aspects of our business in an honest and ethical manner at all times. This policy applies to any person working for, or on behalf of the company, and for any person, company or organisation providing us with goods or services.

To demonstrate this commitment, we will not:

- Offer, promise, give, accept or demand contributions, of any kind, for the purpose of obtaining or retaining business, or any other commercial advantage;
- Provide excessive gifts or hospitality with the intention of inducing anyone to act improperly;
- Offer, or give in to demands, to make illicit or illegal payments to agents, public officials, or the employees of business partners of anyone else with whom we conduct business;
- Make illegal or inappropriate contributions to candidates for public office, or to political parties or other political organisations;
- Accept or offer 'kick-backs' or any other reciprocal agreements;
- Participate in cartels, cover pricing, bid rigging, or any other form of collusion.
- We will:
- Keep appropriate internal records that will evidence the business reason for making any payments to third parties;
- Raise awareness of the need to combat bribery and corruption with our business partners by publication of this Policy and (where appropriate) relevant contractual provisions and support initiatives designed to reduce the risk of bribery and corruption;
- Promote employee awareness of, and compliance with, company policies against bribery, and encourage any concerns about any issue or suspicion of malpractice to be raised at the earliest possible stage;
- Ensure that anyone raising a concern about bribery and/or corruption will not suffer any detriment as a result, even if they are found to be mistaken.



Kevin Coote  
*Kevin Coote*  
Plant Manager  
Crosby Straightpoint

This Policy is aligned, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015. The implementation and operation of this management system underlines our commitment to this policy.

Formal procedures concerning bribery and corruption have been established, including disciplinary procedures where they are breached.

The competence and awareness of all staff is regularly reviewed to ensure the effectiveness of their contribution to maintaining this policy.

As part of our internal and external communication procedures and staff training programmes, it is ensured that this policy, and associated other information, is communicated, understood, implemented and maintained at all levels within the organisation.

This policy is implemented through the Company and is regularly reviewed by top management to ensure its continuing suitability, and relevance, and at other times, following any changes to the Company organisational structure, business activities or other policies and procedures relating to bribery and corruption.

Serious breaches of this policy will be reported to the police for further investigation.

UK	KITO CROSBY™	USA
123 Proxima Park, Houghton Avenue, Waterlooville, Hants, PO7 3DU Tel: 02392 484491 sales.sp@kitocrosby.com straightpoint.com		2801 Dawson Road Tulsa, OK 74110 United States Tel: (918) 834 4611 kitocrosby.com

