Tax Evasion Policy

1. Statement

Tax evasion, tax fraud and attempts to facilitate such actions are unethical and against our ethos. These crimes cheat the government out of revenue it needs to create the conditions for our business to flourish. It amounts to stealing from our customers and from ourselves.

This Policy summarises our procedures for the prevention of tax evasion.

2. Scope

The Policy applies to all employees and those acting on our behalf.

We are committed to a zero-tolerance approach to tax evasion. We are committed to countering the risk of any employee, contractor, business partner or representative of our company engaging in the criminal facilitation of tax evasion.

We expect everyone who works with our company to fully comply with their tax obligations.

We will not tolerate, permit or allow any person associated with us to engage in the facilitation of tax evasion or tax fraud by any of our customers, suppliers, business partners, contractors or employees.

We are committed to complying in full with tax laws. We do this by respecting the law and the intentions of tax policy. We aim to pay the right amount of tax at the right time, on all the eligible profits we make.

We believe in paying our fair share, and that everyone working with us should too.

3. Responsibility

Your Responsibilities

Our code of conduct sets the standards of behaviour we expect from you. You have a responsibility to take reasonable action to prevent harm to our Company. We will hold you accountable for your actions and omissions. Any action that breaches the Criminal Finances Act and the tax laws harms our business and will not be tolerated.

You are responsible for properly following our policies and procedures.

You should generally ensure that all taxes are properly paid. If you are ever asked by anyone either inside or outside our company to deviate from our standard procedures you must report this immediately as someone may be attempting to evade tax.

Any employee who has any concerns relating to a potential breach of this policy must immediately follow our whistleblowing policy and report the matter without delay.

Directors

The Directors have approved this policy and our commitment to zero tolerance of tax evasion. The Directors are responsible for monitoring compliance with this policy.

4. Training & Communication

You must familiarise yourself with our prevention of tax evasion policy and attend all relevant training that we provide. You must ensure you have the appropriate level of knowledge for your roles. You be aware of the latest internal information regarding the prevention of tax evasion.

5. Our risk assessment

Our risk assessments cover the categories of business operations we are involved in where there is a risk of tax evasion.

High risk areas for our business include:

- Accounts payable
- Accounts receivable
- Payment to contractors

The key factors which may increase risk include:

- Cash transactions
- Transactions in certain regions of the world.

[Include mitigation procedures for each high-risk area. These could include:

Accounts Payable

- Only contract with businesses which have good reputations.
- Ensure all information on an invoice is correct and as expected.
- Have the full contact details of the supplier and ensure it matches to where the payment is being made.
- Specify in contracts that VAT and other sales taxes must be added to invoices and have written reasons why such added taxes are not required.
- Do not pay suppliers in cash. If cash payments must be made, ensure they are properly invoiced and a receipt is supplied.

Accounts Receivable

- Ensure correct procedures are followed.
- Do not process off-system invoices.
- Ensure all invoices have the correct VAT coding.

Contractors

- Any wage payments outside of payroll must be expressly approved.
- Where tax is required to be deducted at the source this must be done.
- Payments to contractors should only be made in strict accordance with company policies.
- Cash payments should not be made. If they are, invoices and receipts must be present.
- Any tax related withholdings must be deducted and recorded.

- Payments without deductions should only be made if there is a reasonable expectation that the recipient will meet their tax obligations.

6. Our clients [for professional services firms]

We are committed to the following principles:

- Our relationship with our clients is built on honesty, integrity, mutual trust and a commitment to professionalism.
- Our clients expect us to give the best possible advice and work in their best possible interest.
- Tax evasion is unethical to who we are as a company and goes against our dedication to professionalism in our business.
- We firmly believe that any action which would breach tax laws or the Criminal Finances Act is not in the best interest of our clients.
- The advice we give our clients we would give to ourselves and we endeavour to ensure all advice we give on tax matters is consistent with the law and with HMRC guidance.
- Neither our company or any person associated with our business will give advice to a client that would result in a breach of the Criminal Finances Act, either for us or our client.
- We do not condone or support tax evasion and we will not facilitate, give advice or in any way assist our clients to commit tax evasion offences.
- We will not support or work with clients who seek to criminally evade taxes, wherever in the world the tax is owed.

7. Our commitment

We are committed to the following principles:

- Our business is carried out fairly, honestly and openly.
- Our values inform everything we do.
- We will never sell any product or service where we know or suspect that any aspect of the transaction is being misused, abused or otherwise corrupted for the purposes of tax evasion.
- We will never buy any product or service from any supplier where it is known or suspected that any aspect of the transaction is being misused, abused or otherwise corrupted for the purposes of tax evasion.
- We will immediately terminate any agreement or business relationship as soon as our company learns of or suspects tax evasion may be taking place.
- We will not progress any business opportunity where there is any suspicion that any aspect of it may involve tax evasion.
- We will not do business with others who do not also hold to at least the same standard of preventing tax evasion.
- We will regularly monitor and review this policy.
- Any employee found in breach of this policy will be subject to disciplinary action.

- We will not tolerate any contractor, business partner, representative or other third party associated with us failing to uphold this policy.

- No employee will suffer demotion, penalty, or any other adverse action for reporting any breach of this policy or from refusing to carry out an action which may lead to a breach of this policy.

Policy Issue Date	Director Signature
23rd April 2025	