

Criminal Facilitation of Tax Evasion Policy

About this policy

This policy sets out the Company's (**we, our**) approach and zero-tolerance approach to the criminal facilitation of tax evasion.

Introduction

There are two offences under the Criminal Finances Act 2017 (the **CFA**):

- Failure to prevent facilitation of a domestic tax evasion offences; and
- Failure to prevent facilitation of overseas tax evasion offences.

We are committed to maintaining a zero-tolerance approach to facilitating tax evasion and maintaining an anti-corruption culture throughout all aspects of our business activities. Our corporate conduct is based on our commitment to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter the facilitation of tax evasion.

Scope

This policy applies to all employees and officers of the Company, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the Company ("associated persons") within the UK and overseas. Every employee and associated person acting for or on behalf of, the Company is responsible for preventing the facilitation of tax evasion. Any breach of the policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

Risk Management

The Company will conduct risk assessments for each of its key business activities on an annual basis and, where relevant, will identify employees, officers or associated persons of the Company who are in positions where there is a higher risk.

The Company will:

- Continue to assess areas of risk;
- Monitor "at risk" employees and associated persons;
- Provide training where appropriate to employees and associated persons;
- Undertake reasonable due diligence of third parties and associated persons; and
- Communicate its zero-tolerance approach to facilitating tax evasion to third parties, including customers, suppliers and joint-venture partners.

What you cannot do: Prohibited Conduct

There are two offences under the Criminal Finances Act 2017 (CFA):

1. Failure to prevent facilitation of domestic tax evasion offences; and
2. Failure to prevent facilitation of overseas tax evasion offences.

Under the CFA, the Company will be guilty of the domestic offence if:

- stage 1: there is criminal tax evasion by a taxpayer (either an individual or an entity) under the existing law;
- stage 2: criminal facilitation of this offence by an “associated person” of the corporation, as defined by the Accessories and Abettors Act 1861; and
- stage 3: the Company failed to prevent its Associates from committing the criminal act as outline at stage two above.

The overseas fraud offence test:

- Would this be a crime if carried out in the UK; and if yes
- Does the overseas jurisdiction have the equivalent laws at stage 1 and stage 2.

In addition, the Company can be found guilty of an offence of failing to prevent the criminal facilitation of tax evasion by those acting on our behalf.

Non-compliance

If the Company is successfully prosecuted it may face an unlimited fine and possible ancillary sanctions, such as confiscation or serious crime prevention orders in addition to suffering serious reputational damage.

Other Associates in breach of this Policy will be subject to the appropriate action under the terms of their services contracts or services agreements.

Whistleblowing

Any suspicion or knowledge of the facilitation of tax evasion of any kind must be reported to Gemma Goldrein. Reports of this kind will be treated in confidence and in a positive manner and will be investigated in full in accordance with our Whistleblowing Policy, which may be found on CIPHR. Such matters may also be reported to Elliot Goldfarb, Ian Shaw, the HR Department or Group Secretariat; all of whom are required to inform Gemma Goldrein as soon as possible.

Monitoring and Review

Gemma Goldrein is responsible for the monitoring and review of this Policy to ensure it reflects the Company’s zero tolerance to the facilitation of tax evasion and is current and appropriate as to good practice and legislation.

The Company will undertake a risk assessment on an annual basis, and more frequently if the business undergoes any material structural change (e.g. a business acquisition, change in financial systems).

The risk assessment will be reported to the board on an annual basis.

How to get help and guidance

If you have any questions concerning the above, please contact Gemma Goldrein, GGoldrein@williampears.co.uk / DD 0207 433 6304.

Maintenance of this Policy

This policy does not form part of any terms and conditions of employment and the Company reserves the absolute right to review, revise, amend or replace the contents of this policy from time to time to reflect the changing needs of the business and to comply with legislation