

## **Document Record**

Rev	Changes	Date
1	Original	1 September 2024

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## Anti-facilitation of Tax Evasion Policy

We take a zero-tolerance approach to the facilitation of tax evasion, whether under UK law or under the law of any foreign country. We are committed to upholding all laws relevant to countering tax evasion (including the Criminal Finances Act 2017 (the Act)) in any jurisdiction in which we operate.

It is our policy to conduct all of our business in a professional, fair, honest and ethical manner. We will not tolerate anyone associated with us (as defined in the Act) who deliberately and dishonestly facilitates the criminal evasion of tax by a third party. Any employee who is suspected to have facilitated tax evasion will be subject to our disciplinary procedures and reported to the relevant authority.

It is our expectation that all those to which/whom we provide services, or which/who provide services to us will act with integrity and pay the appropriate amount of tax. We will not act for any entity or individual where we know or suspect that they are attempting to exploit or misuse our services for the purpose of tax evasion. Should we discover that any agent associated with us has attempted to, or succeeded in, facilitating tax evasion by a third party, we will cease to engage with them immediately, and report them to the relevant authority.

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