Anti-Facilitation of Tax Evasion policy statement

It is a criminal offence to dishonestly evade tax or to assist others to do so in many jurisdictions, including the UK. Keltbray take a zero-tolerance approach to any criminal activity, including tax evasion or facilitation of tax evasion committed by any of our employees, agents, business partners or associated persons.

Keltbray's safeguards to protect against any unlawful activity are robust and we are committed to acting diligently and lawfully.

1. About this policy

This policy has been produced to ensure that any associated persons do not participate in the facilitation of tax evasion at any time, in any jurisdiction and in any capacity.

We hold our employees to the highest individual and collective standards and have a zero-tolerance stance on anyone engaging in any form of tax evasion, whether directly or as a facilitator. We constantly strive to ensure that any party who acts either for or with us (e.g. employees, agency staff, suppliers, subcontractors, etc.) do not facilitate tax evasion in doing so.

2. What is facilitation of tax evasion?

Tax evasion is any fraudulent activity that intends to divert funds from the public revenue. A facilitation offence will be committed where an individual or entity deliberately and dishonestly facilitates tax evasion.

An example of this would be if a member of staff knowingly facilitated or turned a blind eye to a contractor or supplier's tax evasion. This may be achieved for example through false invoicing or making payments in cash.

Keltbray could be criminally liable if it fails to prevent the individual or entity, who was acting for or on behalf of the company at the time, from facilitating the tax evasion. Keltbray's defence is that it has reasonable prevention procedures in place to prevent the facilitation from taking place.

3. Consequences

The facilitation of tax evasion is a criminal offence with serious consequences for individuals found guilty, from financial penalties to jail. Breaches of this policy by employees will result in disciplinary action and may result in dismissal/termination of contract.

Keltbray can also be liable and face prosecution, which would prevent Keltbray from operating in certain jurisdictions and bidding for certain jobs. Keltbray could also face significant financial penalties.

4. Your responsibilities

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of instances of facilitation of tax evasion are the responsibility of all those working for or providing services on behalf of Keltbray.

Under the relevant legislation, you are not required to prevent a third party (e.g. customer, supplier, contractor) from committing tax evasion. However, if you continue to work with or for them in the knowledge that they are intending on committing tax evasion, you could be found to have committed the civil offence of the facilitation of tax evasion. This would leave Keltbray liable for the criminal offence.

5. Training

Training for key employees will be provided. Attendance is mandatory.

Red flags

Employees must remain vigilant in spotting 'red flags'. In the event that a red flag is identified, it must be reported immediately to the Chief Financial Officer. Red flags include but are not limited to:

- The customer, supplier, subcontractor or agency staff member refuses or fails to confirm that they will comply with any due diligence we deem necessary
- The supplier or subcontractor operates in a country where tax evasion is more prevalent
- The supplier, subcontractor or agency staff member has unusual invoicing or documentation practices (for example, invoicing a different company to the one receiving the service)
- The supplier, subcontractor or agency staff member requests payments to be made in cash, to another entity, or to bank accounts in a different country

Finance

No payments should be made, approved or processed where there is any suspicion that any part of the payment is to be used for any purpose other than that detailed by the documents which evidence the payment. No payments can be left unrecorded.

6. How can you raise a concern?

All information we receive relating to breaches of the policy will be treated seriously and investigated thoroughly. Even where you are mistaken, as long as you act in good faith, Keltbray will protect you.

If a member of staff has a concern about tax evasion or the facilitation of tax evasion, they should normally first raise the issue with their immediate superior. This may be done orally or in writing.

If a member of staff feels unable to raise the matter with their immediate superior, for whatever reason, they should raise the matter with the Chief Financial Officer.

7. Review of policy

Keltbray reserves the right to update this policy, and this policy will be reviewed by the Board annually.



Peter Burnside
Chief Executive Officer

Last review date: June 2026
Next review date: June 2027