

INTRODUCTION

The purpose of this policy is to communicate the company's approach to the Corporate Criminal Offence of the Failure to Prevent the Criminal Facilitation of Tax Evasion ("CCO").

SCOPE

A criminal offence is committed under this legislation where an associated person of Oakray Limited (such as an employee, sub-contractor, consultant or agency worker) deliberately and dishonestly facilitates a taxpayer evading tax, and Oakray Limited has not put in place reasonable preventative procedures.

WHAT IS TAX EVATION

Tax evasion involves the deliberate and dishonest use of illegal practices in order not to pay the right amount of tax. This could include not reporting all of the income, deliberately not filing an accurate tax return, hiding beneficial ownership and taxable assets from HMRC or diverting funds to hide income from local taxation authorities.

Examples could include, but are not restricted to the following:

- A supplier, contractor or anyone in your role within our business asking you to do something that does not match up with official documentation – for example, paying into a different account than that which is specified on the invoice
- You are feeling under pressure to process or approve an invoice (or make changes to our contractual terms) that you don't feel makes sense, for example in terms of changing the payment details or VAT amount
- You receive an invoice from a third party that appears to be non-standard or customised or is different to what you expected
- Contrasts where invoices are not exchanged for the face value of services/good exchanged
- You are aware of any short cuts in our Supplier or Customer Take On procedures (e.g., someone you know circumventing the supplier set-up and P2P process which means that there are no checks on the company/person they were purchased from or contract in place)
- Someone who works for a third-party supplier offering you what seems like a discount, e.g., because they tell you they don't need to charge you VAT - without giving a reason
- Being concerned about the set up and/or supporting paperwork of a particular transaction that you think may not reflect the true commercial reality or fact pattern
- Someone at work (for example an employee or a contractor) claiming to have found a 'short cut' in how much tax they pay or you are aware that tax is not being declared
- Someone at work (for example an employee or a contractor) claiming illegitimate expenses
- Someone asking for a favour that is not in line with your company policy
- Any other knowledge or suspicion that anyone in our business, either in the UK or any other country, is evading or facilitating tax evasion.

KEY PRINCIPLES

The following basic principles are applied by Oakray Limited:

- Ensuring that we have reasonable prevention procedures in place to prevent any person associated with Oakray Limited from facilitating tax evasion. Our key procedures comprise:
 - Obtaining assurances and warranties from suppliers that they have reasonable prevention procedures in place;
 - Providing training to our staff and being clear about the consequences if a person associated with Oakray Limited facilitates tax evasion;
 - Providing a pathway for reporting wrongdoing and providing protection for whistle-blowers;
 - Operating existing, and implementing new, procedures which reduce the opportunity for employees to facilitate tax evasion, and regularly reviewing these for effectiveness and improvement;
- Adopting a zero-tolerance attitude towards tax evasion and the criminal facilitation of tax evasion;
- Where internal investigations indicate a person associated with Oakray Limited has facilitated tax evasion, they will be reported to the authorities and Oakray Limited will fully support prosecution to the fullest extent of the law;
- Not to use the services of others who are unable to provide assurance that they have reasonable prevention procedures in place.

WHO THIS POLICY APPLIES TO AND THEIR RESPONSIBILITIES

This policy applies to all persons associated with Oakray Limited, including for employees, sub-contractors, consultants or agency workers, and any person acting on behalf of Oakray Limited.

- All persons associated with Oakray Limited are responsible for adhering to this policy
- All employees, sub-contractors, consultants and agency workers are responsible for not facilitating tax evasion of taxpayers
- The Senior Management Team are responsible for ensuring Oakray Limited fulfils its key principles
- The Board of Directors is responsible for ensuring appropriate policies are in place and creating a corporate culture that supports compliance

FURTHER INFORMATION

The consequences of a prosecution for the business include unlimited fines, reputational damage and the likelihood of regulatory sanction. Tax evasion and facilitation of tax evasion are also punishable for individuals with fines and custodial sentences. We therefore take our legal responsibilities very seriously.

Any individual who breaches this policy may face disciplinary action, potentially resulting in dismissal for misconduct or gross misconduct. Similarly, we may terminate our relationship with other individuals, organisations and other associated persons working on our behalf if they breach this policy

As an employee you commit to:

- Complying with this policy
- Reporting any concerns

If you have a concern about any issues relating to our Corporate Criminal Offence policy performance or arrangements, or you have a question about this policy you can speak to any of the following:


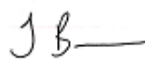
- Your Line Manager
- The Financial Controller
- The Managing Director

ASSOCIATED DOCUMENTS

POL074 Anti-Bribery Policy

Document History

(For previous version changes, please look to the document control spreadsheet)

Version Number	Date	Created by	Signature	Approved	Signature	Description	Review date
1	24/05/2023	Nicholas Quail		James Barnard		New Policy	24/05/2024