

Reference	247 POL 33
Version	1.0
Issue Date	18/01/2022
Approved	MD
Review Date	05/01/2027

ANTI TAX EVASION POLICY

INTRODUCTION:

The 247 ALLIANCE LTD.'s anti-tax evasion policy was put in place following the Criminal Finance Act 2017 which created two new corporate criminal offences, the first applying to the facilitation of UK tax evasion and the second to the facilitation of foreign tax evasion.

DEFINITION OF TAX EVASION:

- Tax evasion is a criminal offence which is committed through the deliberate and dishonest evasion of tax (either UK tax or tax in a foreign country) or through taking steps to enable another person to evade tax. For the facilitation of tax evasion to be a criminal act, a person must have deliberately and dishonestly helped another person to evade tax: it does not include the accidental, ignorant, or negligent facilitation of tax evasion.
- Tax is defined widely to cover all forms of UK taxation, including corporate tax, income tax, VAT, stamp duty, NI contributions etc. It is not the same as tax avoidance which is the legal minimisation of tax payable.

Corporate criminal offences related to tax evasion are detailed in Part 3 of the Criminal Finances Act 2017 and can be summarised as:

- Failure to prevent facilitation of UK tax evasion – this is aimed at catching corporations facilitating the evasion of UK taxes.
- Failure to prevent facilitation of foreign tax evasion – this covers the evasion of foreign taxes facilitated by an entity that has a connection with the UK (e.g. a UK based office) and where there is dual criminality with the UK.
- Although these apply mainly to the regulated sector, anyone can be convicted of these offences.

Factors which require particular consideration when carrying out 247 ALLIANCE LTD. business include:

- Payment of a substantial sum in cash / businesses that are cash intensive.
- Payment received from unknown or un-associated third parties.
- A secretive client: e.g. refuses to provide requested information without good reason.
- Anonymous transactions.
- A previous transaction for the same client which has been, or should have been, reported to the nominated officer.
- Any concerns about the identity or honesty of a client.
- Transactions with countries identified as not having robust anti-money laundering or counter-terrorism financing arrangements.
- Transactions with countries subject to sanctions or embargoes or similar measures imposed, for example, by the UN.

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OBLIGATIONS OF THE 247 ALLIANCE LTD:

The 247 ALLIANCE LTD., in order to put in place proportionate anti-tax evasion safeguards, will:

- Continue to apply customer due diligence measures when dealing with new clients or undertaking certain transactions.
- Appoint nominated officers to whom suspicions of tax evasion activity should be reported.
- Implement internal reporting procedures.
- Establish internal procedures with respect to tax evasion.
- Train relevant staff in the subject.

The 247 ALLIANCE LTD.'s actions to comply with these obligations are outlined below.

NOMINATED OFFICERS:

- The 247 ALLIANCE LTD. has nominated the Manager of Finance, as the nominated officer to whom suspicions of tax evasion activity should be reported.

REPORTING PROCEDURE:

- If a member of staff or other individual acting on behalf of the 247 ALLIANCE LTD. suspects any instance of tax evasion or its facilitation, they should contact the nominated officer or deputy immediately.
- Where necessary the nominated officer will request completion of the tax evasion report form. The steps to follow are clearly marked on the form.
- The nominated officer will make a full assessment of the evidence presented with the report, before deciding whether it constitutes a sufficient case for suspecting tax evasion, or its facilitation has taken place. If the nominated officer so determines, it is their duty to report it to the HMRC.
- All transactions involved in the suspected activity are to be ceased immediately until further notice from the HMRC. Any person(s) proceeding with any transaction involved in the suspected activity could be committing an offence and therefore be liable for prosecution.

STAFF TRAINING:

- Appropriate staff training will continue to be identified and implemented.
- This document provides all the necessary information for staff wishing to report suspected instance of tax evasion or its facilitation, however in the event of further queries please contact the nominated officer or deputy.

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RECORD-KEEPING PROCEDURE:

- All documentary evidence collected by the nominated officer will be recorded and retained in line with the 247 ALLIANCE LTD.'s retention policy.

Malik Mustafa
Director
05/01/2026

Review Date: 05/01/2027

Signed

