

Anti-Facilitation and Tax Evasion Policy

Policy Statement

Wattrus Group Ltd is committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter tax evasion facilitation

We operate a zero-tolerance approach to tax evasion and the criminal facilitation of tax evasion in all forms and business should be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented.

This policy outlines the responsibilities of employees, officers, subcontractors, consultants, suppliers, and all persons associated with Wattrus Group Ltd to ensure that no one acting on our behalf engages in or facilitates tax evasion.

Statement of Zero-Tolerance

Wattrus Group Ltd strictly prohibits:

- Tax evasion by any employee or associated person
- The **criminal facilitation of tax evasion** by anyone acting on behalf of the company
- Failing to report concerns or suspicious activity relating to potential tax evasion

We will not engage in or maintain business relationships with individuals or organisations who do not demonstrate a commitment to ethical tax practices.

The Six HMRC Principles

This policy adheres to the six principles set out by HMRC for preventing the facilitation of tax evasion.

Proportionality of Risk-Based Prevention Measures

Wattrus Group Ltd applies procedures that are proportionate to the nature, scale, and complexity of our operations. When assessing tax evasion risk, we consider:

- Potential opportunities for tax evasion
- Motivations or pressures that may lead to such behaviour
- Methods by which tax evasion might be facilitated
- The level of exposure across different functions or roles

These insights inform the controls, resources, and oversight we put in place.

Top-Level Commitment

Senior leadership at Wattrus Group Ltd demonstrates full commitment to preventing tax evasion. This includes:

- Approval and promotion of this policy
- Ensuring adequate resources for training, compliance, and oversight
- Assigning senior responsibility for monitoring and enforcing compliance
- Supporting robust disciplinary action for any breach of this policy
- Reinforcing a corporate culture of integrity and zero tolerance

Risk Assessment

Wattrus Group Ltd conducts regular assessments to identify and understand risks relating to tax evasion and its facilitation. These assessments consider:

- The nature and complexity of our services
- Relationships with clients, subcontractors, and suppliers
- Geographic or sector-specific risk factors
- Transactional or process-related vulnerabilities

Risk assessments are documented and reviewed periodically by senior management.

Due Diligence

We undertake proportionate due diligence on:

- Employees
- Subcontractors
- Consultants and intermediaries
- Suppliers and service providers
- Any party acting on behalf of Wattrus Group Ltd

Due diligence may include compliance questionnaires, reference checks, financial integrity reviews, or confirmation of tax compliance status.

Communication & Training

Wattrus Group Ltd ensures that this policy is communicated, understood, and embedded within our organisation by:

- Making this policy available to all staff and associated persons
- Providing appropriate training based on roles and risk levels
- Ensuring new starters receive clear guidance on compliance expectations
- Reiterating policy requirements during periodic reviews and updates

Monitoring & Review

This policy and its associated controls are monitored on an ongoing basis. Formal reviews are conducted at least annually—or sooner if legislative changes occur—and include:

- Assessing compliance effectiveness
- Reviewing monitoring and reporting outcomes
- Identifying improvement opportunities
- Updating procedures where necessary

Findings are documented and overseen by senior management.

Reporting Concerns

All employees and associated persons must immediately report any suspicion of:

- Tax evasion
- Attempts or requests to evade tax
- Attempts to facilitate tax evasion
- Unusual, irregular, or suspicious financial activity

Reports may be made in confidence to a board member.

Wattrus Group Ltd prohibits retaliation against individuals who report concerns in good faith.

Consequences of Breach

Any breach of this policy will result in:

- Disciplinary action (including dismissal)
- Termination of contractual relationships
- Reporting to HMRC and/or law enforcement
- Possible civil or criminal legal action

Wattrus Group Ltd may also seek to recover financial losses or damages.

Who is responsible for this policy?

The Board of Directors has approved and has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it.

A handwritten signature in dark blue ink, appearing to read 'A. Wattrus', is written over a horizontal line.

Andrew Wattrus
Managing Director

Signed 2nd December 2025