



36. Tax Evasion Offences Policy

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Woodhurst is committed to preventing the facilitation of tax evasion in any form, in compliance with the **Criminal Finances Act 2017**. We uphold the highest standards of honesty and integrity in our operations and have a zero-tolerance approach to any illegal activity, including the facilitation of tax evasion by our employees, associates, and any third parties working on our behalf.

36.1 Purpose

The purpose of this policy is to:

- Clearly outline our stance on the prevention of tax evasion and the facilitation of tax evasion.
- Ensure that all employees and third parties working with Woodhurst understand their responsibilities under the **Criminal Finances Act 2017**.
- Provide a framework to prevent and detect any actions that could be considered as facilitating tax evasion.

36.2 Scope

This policy applies to all employees, contractors, consultants, suppliers, and other third parties who are associated with Woodhurst. It covers:

- The prevention of criminal tax evasion (whether in the UK or abroad).
- The prevention of the facilitation of tax evasion by any person acting on behalf of Woodhurst.

36.3 Key Principles

Woodhurst adheres to the following key principles regarding tax evasion and its facilitation:

- **Zero Tolerance:** We have zero tolerance for any employee or associated party who engages in or facilitates tax evasion. This includes any conduct that seeks to evade or assist in the evasion of taxes.
- **Compliance with Laws:** We ensure that all business activities comply with UK tax laws and any other relevant laws in jurisdictions in which we operate.
- **Due Diligence:** We conduct appropriate due diligence on third parties, suppliers, and business partners to ensure that they do not engage in or facilitate tax evasion.

35.4 Criminal Finances Act 2017

The **Criminal Finances Act 2017** introduced new corporate criminal offences for failing to prevent the facilitation of tax evasion. The Act applies to:

- **UK Tax Evasion Offence:** The deliberate and dishonest evasion of UK tax by a taxpayer, facilitated by an associated person of a corporate entity.
- **Foreign Tax Evasion Offence:** The deliberate and dishonest evasion of foreign taxes by a taxpayer, facilitated by an associated person of a UK corporate entity.

Under the Act, a company can be held criminally liable if:

1. A tax evasion offence is committed by a taxpayer.
2. The offence is facilitated by an employee, contractor, or another associated person.
3. The company did not have reasonable procedures in place to prevent the facilitation of the offence.

36.5 Responsibilities

- **Leadership Team:** The leadership team is responsible for ensuring that Woodhurst has adequate procedures in place to prevent the facilitation of tax evasion. They must ensure that all employees are aware of their responsibilities under the Criminal Finances Act 2017.
- **All Employees and Associated Persons:** Every employee and any third parties acting on behalf of Woodhurst have a responsibility to ensure they do not engage in or facilitate any form of tax evasion. This includes avoiding activities that could be interpreted as aiding or abetting tax evasion.

36.6 Reasonable Prevention Procedures

Woodhurst. has established the following prevention procedures to comply with the Act:

- **Risk Assessment:** We regularly assess the risk of our business operations being used to facilitate tax evasion.
- **Due Diligence:** We apply due diligence procedures when engaging new clients, suppliers, or business partners to ensure they comply with tax regulations.
- **Training:** We provide training to employees on the Criminal Finances Act 2017, tax evasion, and the steps they must take to avoid becoming involved in illegal activities.
- **Clear Communication:** All employees and associated persons are made aware that any involvement in tax evasion or facilitation is strictly prohibited and will result in disciplinary action, including termination and potential legal consequences.

36.7 Reporting and Whistleblowing

- **Reporting Suspicious Activity:** Any employee or third party who suspects or becomes aware of any tax evasion activity within Woodhurst or any associated third party must report it immediately to their line manager or through the company's confidential whistleblowing channels.

- **Protection for Whistleblowers:** Woodhurst is committed to ensuring that anyone who reports tax evasion in good faith is protected from retaliation. Whistleblowers can report concerns anonymously without fear of reprisal.

36.8 Consequences of Non-Compliance

Non-compliance with this policy can have severe consequences, including:

- **Internal Disciplinary Action:** Employees found to have facilitated or been complicit in tax evasion will face disciplinary action, up to and including dismissal.
- **Legal Consequences:** Woodhurst may be subject to criminal prosecution, financial penalties, and reputational damage if found to have failed in preventing the facilitation of tax evasion by associated persons.

36.9 Monitoring and Review

- **Ongoing Monitoring:** The effectiveness of this policy is monitored continuously through regular risk assessments, audits, and reviews of business operations.
- **Annual Review:** This policy is reviewed annually by the leadership team to ensure it remains up to date with any changes in the law or company operations.

Woodhurst takes a strong stance against tax evasion and the facilitation of such illegal activities. By adhering to the principles and procedures outlined in this policy, we ensure that we conduct our business with integrity and comply fully with the **Criminal Finances Act 2017**. All employees and associated persons are expected to uphold these values in their work.