

Policy Statement

IVC Evidensia (The Group) operates as a Global business and as such has a duty to conduct our business affairs in a responsible and transparent way in line with our code of conduct principle of “Safeguarding our Reputation”.

This policy sets out the background of this legislation and the Group’s expectations of all our people and other ‘associated persons’ in meeting the requirements of this legislation in all territories in which we operate.

The UK Criminal Finances Act 2017 consists of 2 key corporate offences, being:

- a) the failure to prevent facilitation of UK tax evasion; and
- b) the failure to prevent facilitation of foreign tax evasion.

Certain Governments believe that businesses should be criminally liable where they fail to prevent those who act for, or on their behalf, from criminally facilitating tax evasion.

Legislation applies to all taxes including direct and indirect tax, corporate and personal tax, as well as social security contributions.

The Group will take all reasonable steps to prevent the facilitation of tax evasion and to maintain high standards in all we do.

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate as well as implementing and enforcing effective systems to counter tax evasion facilitation.

Criminal prosecution of the business, unlimited financial penalties and reputational damage to the business can result if we fail to comply with this legislation (and individuals can be prosecuted for tax fraud or facilitating tax fraud under pre-existing criminal legislation).

Our principles and values provide the framework for all colleagues to make the right decisions and to act in a fair, trustworthy and impartial manner at all times, towards both internal and external partners. This includes ensuring we act in accordance with the laws of every territory in which we operate.

Scope

This policy applies to all persons working for the Group or on our behalf in any capacity, including colleagues at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us as ‘associated persons’ under the UK Criminal Finances Act 2017. While this is a UK piece of legislation, offences committed by a colleague or associated person working in other locations are within the scope of the foreign tax evasion offence.

If a colleague is uncertain about how this Policy might affect their activities or has any questions about its application, they should contact their manager or the Legal and Compliance team. Failure to comply with this policy could result in disciplinary action up to, and including, summary dismissal.

Objectives

The objectives of this Policy are to:

- (a) set out our responsibilities, and of those working for us, in observing and upholding our position on preventing the criminal facilitation of tax evasion; and
- (b) provide information and guidance to those working for us on how to recognise and avoid tax evasion.

Policy

Our policy is to have a zero tolerance to tax evasion and facilitation of tax evasion.

We will not work with any third party (including those who contract with us or otherwise provide services to us) who do not have a similar commitment of zero tolerance to tax evasion and the facilitation of tax evasion.

We expect all our colleagues and anyone who works for us – e.g. contractors, locums, agents, or other business partners – not to engage in any activity which evades tax or facilitates, or *may* facilitate, the evasion of tax by any other person (company or individual), irrespective of where in the world they are located.

We will not engage with any third party or associated person who do not have a similar approach.

This means we expect businesses and people that we engage with to comply with their own tax obligations and correctly account for all taxes that they may owe. If there are any concerns that this may not be the case we should actively seek to clarify the position. If any suspicions of tax evasion, or the facilitation of tax evasion, persist we should not engage with said party.

We expect all colleagues and associated persons to be able to identify and take steps to prevent any scenarios where there may be a risk that they are facilitating others to commit tax evasion, either in the UK or overseas.

Identifying Concerns

It is very important everyone within our business is aware of the triggers and behaviours which could indicate that there may be facilitation of tax evasion. Do not expect people to say that they are evading tax.

Any unethical, irregular or suspicious behaviours that may lead you to suspect the facilitation of tax evasion should be reported.

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

- A supplier, contractor or anyone within our Group asking to do something that does not match up with official documentation – for example, paying into a different account than that which is specified on an invoice;
- Being pressurised to process or approve an invoice (or make changes to our contractual terms) that does not make sense, for example changing the payment details or tax amount;
- An invoice from a third party that appears to be non-standard or customised or is different to what was expected;
- Contras where invoices are not exchanged for the face value of services/good exchanged;
- Short cuts being taken in our new Supplier onboarding procedures (e.g. circumventing the supplier set-up 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 what seems like a discount, e.g. because they tell you they don't need to charge you tax - without giving a reason;
- Being concerned about the set up and/or supporting paperwork of a particular transaction that may not reflect the true commercial reality or fact pattern;
- Someone at work (for example a colleague 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 a colleague or a contractor) claiming illegitimate expenses;
- Running a promotion, competition or incentive at work without seeking advice on tax implications from the Head of Reward, Finance or Legal first;
- Someone asking for a favour that is not in line with Group policies;
- Third-party requests for payment to be made to a country or geographic location different from where the third party resides or conducts business;
- Third-party requests for payment in cash and/or refusing to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- A third party working for us as a colleague asks to be treated as a self-employed contractor, but without any material changes to their working conditions;
- A third party insists on the use of side letters or refuses to put terms agreed in writing or asks for contracts or other documentation to be backdated;
- An invoice for a commission or fee payment that appears too large or too small, given the service stated to have been provided;
- Any other knowledge or suspicion that anyone in our Group, either in the UK or any other country, is evading or facilitating tax evasion.

Reporting

If you know, or suspect, that tax evasion or the facilitation of tax evasion has taken place, or is taking place, you are required to report it. All cases of suspicion in relation to future or existing business should be reported before making any decisions in relation to existing business relationships or committing the business to transact in the manner proposed.

If you are unsure about whether a particular act constitutes tax evasion or foreign tax evasion, raise it with your manager or the Group Tax team as soon as possible. The corporate offence is only committed where an individual deliberately and dishonestly takes action to facilitate the tax evasion or foreign tax evasion. However, a deliberate failure to report suspected tax evasion or foreign tax evasion, or “turning a blind eye” to suspicious activity, could amount to criminal facilitation of tax evasion.

You do not need to be certain that tax evasion is taking place to make a report. You can also report concerns to speakup@ivcevidensia.com or via our external whistleblowing facility <https://ivcevidensia.integrityline.org/>.

Those who raise concerns or report another’s wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Roles and Responsibilities

Peter Rendle, Group Head of Tax, has overall responsibility for this policy. They will monitor it regularly to make sure it is being adhered to. In doing so they act in the interest of our business as a whole, and it is therefore the responsibility of all of us to help them in this.

All colleagues must:

- Read and understand the policy;
- Prevent, detect and report any actual, or suspected, cases of tax evasion and foreign tax evasion;
- Avoid any activity that might lead to, or suggest, a breach of this policy; and
- Complete training annually.

Management must:

- Ensure their teams complete the training; and
- Communicate our expectations to all suppliers, contractors, agents and other business partners at the outset of our business relationship with them, and at regular intervals as appropriate after that.

Third parties must:

- Comply with our zero-tolerance approach to tax evasion and foreign tax evasion; and
- Adhere to this policy as a prerequisite to engaging in business with the Group.

Colleagues are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to Group Tax.

Communication/Training/Implementation

This policy will form part of our annual training release programme of corporate policies which requires all colleagues to read and confirm understanding of the policy. New colleagues will receive training on prevention of **tax evasion** as part of their induction if they have been identified as being at risk of exposure to criminal tax evasion. Existing colleagues will receive training/refresher training on prevention of **tax evasion** as part of the annual training cycle. However, anyone within the organisation can request a copy of the full or abridged training by contacting the Ethics and Compliance team at any time.

Evaluation

We ensure our tax arrangements are independently audited on a regular basis. This includes:

- examining and evaluating our Tax compliance policies, controls and procedures;
- making recommendations in relation to those policies, controls and procedures;
- monitoring our compliance with any recommendations.

The audit may be conducted by an external auditor or internally. Where an external auditor is used, we remain accountable for ensuring the audit complies with relevant regulatory requirements.

Definitions

Third Party: Any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisers, representatives and officials, politicians and political parties.

Associated Persons: Any persons working for the Group or on our behalf in any capacity, including colleagues at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us.

Further Information

Whistleblowing Policy
Anti-Bribery, Corruption and Fraud Policy
Code of Ethics