

## Tax Integrity policy

Our values are Partnership, Integrity and Responsibility and these run through everything we do.

This policy sets out our approach to tax law and measures to conform with all tax legislation and regulations, including our requirements of our people and agents, including but not limited to agency workers, contractors, external consultants and business partners, or any other persons associated with Troup Bywaters + Anders, wherever located, in order to comply with The Criminal Finances Act 2017 (effective as of 30th September 2017).

We request that all of our people, all persons or entities who have, or seek to have, a working relationship with Troup Bywaters + Anders, read and understand our tax integrity policy and agree to act at all times in a way which is consistent with this policy.

### Policy statement

Troup Bywaters + Anders has a zero-tolerance approach to all forms of tax evasion, whether under UK law or under the law of any foreign country.

Our people, agents and those acting on behalf of Troup Bywaters + Anders must not undertake any transactions which can:

- a) Cause Troup Bywaters + Anders to commit a tax evasion offence; or
- b) Facilitate a tax evasion offence by a third party.

Troup Bywaters + Anders 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.

At all times business should be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented.

### What is the facilitation of tax evasion?

*Tax evasion* means an offence of cheating the public revenue or fraudulently evading UK tax, and is a criminal offence. The offence requires an element of fraud which means that there must be deliberate action, or omission with dishonest intent.

This policy applies to all types of tax evasion, regardless of whether it is UK taxes or foreign taxes that have been evaded.

*Tax evasion* facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, or aiding, abetting, counselling or procuring the commission of that offence. Tax evasion facilitation is a criminal offence where it is done deliberately and dishonestly. It is also considered to be tax evasion facilitation if an individual is concerned that tax evasion could be occurring but does not act on these suspicions.

This policy applies to all types of tax evasion facilitation, regardless of whether the individual is in the UK or overseas at the time that the facilitation occurs.

Tax means all forms of taxation including but not limited to corporation tax, income tax, value added tax, stamp duty land tax, national insurance contributions and includes duty and any other form of taxation (however described).

### What comprises unacceptable actions

- a) Engaging in any form of facilitating tax evasion or foreign tax evasion; or
- b) Aiding, abetting, counselling, or procuring the commission of a tax evasion offence or foreign tax evasion offence by another person; or
- c) Failing to promptly report any request or demand from any third party to facilitate the fraudulent evasion of tax by another person; or
- d) Engaging in any other activity that might lead to a breach of this policy; or
- e) Threatening or retaliating against another individual who has refused to commit a facilitation of tax evasion offence or a foreign tax evasion offence or who has raised concerns under this policy
- f) Committing an offence under the law of any part of the UK consisting of being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax.

### Prevention

Whilst there is no exhaustive list of tax evasion opportunities, everyone should remain vigilant and apply common sense when you become aware of: -


- a) Commercial relationships being set up outside the scope and process of standard terms and conditions.
- b) Unusual payment methods; and
- c) Unusual relationships between the agent and the third party (usually the customer).

Unusual payment methods and unusual conduct of third parties with any of our people can be indicative that a transaction may not be as it seems.

### How to raise a concern

Our people are encouraged to raise concerns about any issue or suspicion of tax evasion as soon as possible. Any queries or suspicions should be directed to the Managing Partner, a Partner, or the Partnership Secretary.

These concerns should always be raised and not doing so could have significant consequences for Troup Bywaters + Anders. If any of the parties to which this policy refers are found to have acted contrary to this policy then they will be subject to disciplinary action and referred to the authorities..

Signed:  Peter Anderson – Managing Partner

Date: 3<sup>rd</sup> January 2023