

The background is a vibrant yellow with various abstract elements. There are several clusters of parallel lines in dark blue and light blue, some of which are tilted at angles. A large, irregular white shape is positioned in the lower right quadrant. A pattern of small white dots is scattered across the yellow background, particularly concentrated in the center and lower right. A hand-drawn black arrow points from the word 'LAINE' down towards the text 'ANTI - TAX EVASION POLICY'.

LAINE

**ANTI - TAX EVASION
POLICY**

Policy Owner: Gavin George – Chief Executive Officer

Review & Control: Laura Creasey – Head of People

Version: 1

Issue Date:

Next Review Date:

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POLICY STATEMENT

Laine takes a zero-tolerance approach to facilitating tax evasion, whether under UK law or under the law of any foreign country.

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate; and to implementing and enforcing effective systems to counter tax evasion facilitation. Team members, joint venture partners, temporary workers, contractors, and sub-contractors to Laine must not undertake any transactions which: (a) cause Laine to commit a tax evasion offence; or (b) facilitate a tax evasion offence by a third party who is not an associate of Laine. We are 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.

PURPOSE OF THIS POLICY

The purpose of this policy is to set out Laine's responsibilities, and the responsibilities of those working for us, in observing and upholding our position on preventing the criminal facilitation of tax evasion; and provide information and guidance to those working for us on how to recognise and avoid tax evasion.

We have identified that the following are particular risks for our business:

- customers/clients who may be non-residents; and
- our use of agents.

To address these risks, our management ensures that any identified risks and procedures to mitigate against the same are communicated down the business chain and to relevant third parties to ensure that they are embedded and understood. Additionally, our management require our team members, joint venture partners, those in our business chain and other relevant third parties¹ to review, understand this and other relevant policies.

¹ In this policy, third party means any individual or organisation for whom a member of Laine team comes into contact during the time the member is working for us. This includes, but not limited to actual and potential General Managers, Management Partners, suppliers, distributors, business contacts, agents, and advertise agencies.

COMPLIANCE

This policy applies to all individuals working for Laine, including team members at all levels, including but not limited to joint venture partners, agency workers, seconded workers, volunteers, interns, contractors, external consultants, third-party representatives and business partners, sponsors or any other person associated with us, wherever located.

RESPONSIBILITY

Laine Executive board are overall responsible for this policy and ensuring the policy complies with our legal obligations. Laine team members in leadership roles are responsible for ensuring individuals within their team understand and comply with this policy and are given adequate and regular training on it.

It is not acceptable for you to:

- Engage in any form of facilitating tax evasion, or foreign tax evasion.
- Aid, abet, counsel, or procure the commission of a tax evasion offence, or foreign tax evasion offence, by another person.
- Fail to promptly report any request or demand from any third party to facilitate the fraudulent evasion of tax (whether UK tax or tax in a foreign country), or any suspected fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, in accordance with this policy.
- Engage in any other activity that might lead to a breach of this policy; or
- Threaten or retaliate against another individual who has refused to commit a tax evasion offence, or a foreign tax evasion offence, or who has raised concerns under this policy.

TAX EVASION

In the case for this policy, tax evasion refers to the offence of cheating the public revenue or fraudulently evading UK tax. This is a criminal offence. The offence requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent.

EXAMPLES OF TAX EVASION

Foreign tax evasion means evading tax in a foreign country, if conduct is an offence in that country, and would be a criminal offence if committed in the UK. As with tax evasion, the element of fraud means there must be deliberate action, or omission with dishonest intent.

Tax evasion facilitation means being knowingly concerned in, or taking steps with a view to, 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.

Under the Criminal Finances Act 2017, a separate criminal offence is automatically committed by a corporate entity or partnership where the tax evasion is facilitated by a person working for, or on behalf of, the Company. For the offence to be committed the person working for, or on behalf of, the Company must deliberately and dishonestly take action to facilitate the tax evasion by the taxpayer. If they accidentally, ignorantly, or negligently facilitate the tax evasion, then the corporate offence will not have been committed.

As a corporate entity, Laine, does not have to have deliberately or dishonestly facilitated the tax evasion itself; the fact that the person working for or on behalf of Laine has done so creates the liability for the company. Tax evasion is not the same as tax avoidance or tax planning.

Tax evasion involves deliberate and dishonest conduct. Tax avoidance is not illegal and involves taking steps, within the law, to minimise tax payable (or maximise tax reliefs). In this policy, all references to tax include national insurance contributions (and their equivalents in any non-UK jurisdiction).

RAISING A CONCERN

Team members are encouraged to raise concerns about any issue or suspicion of Tax Evasion or Foreign Tax Evasion as soon as possible.

If there is any suspicion of any intention anyone is attempting to, or committing Tax Evasion or Foreign Tax Evasion, the details of the parties and the transaction must be reported to the Laine finance team who will report the circumstances to HMRC.

Any queries or suspicions should be directed to the following:

- Gavin George – Chief Executive Officer
- Laura Creasey – Head of People

BREACHES OF THIS POLICY

Any team member who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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POTENTIAL RISK SCENARIOS

The following is a list of possible red flags that may arise while you work for us, and which may raise concerns related to tax evasion or foreign tax evasion. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to your manager or a member of the HR team.

- You become aware, in the course of your work, that a third party has made or intends to make a false statement relating to tax; has failed to disclose income or gains to, or to register with, HMRC (or the equivalent authority in any relevant non-UK jurisdiction); has delivered or intends to deliver a false document relating to tax; or has set up or intends to set up a structure to try to hide income, gains or assets from a tax authority;

- You become aware, in the course of your work, that a third party has deliberately failed to register for VAT (or the equivalent tax in any relevant non-UK jurisdiction) or failed to account for VAT.
- A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- You become aware, in the course of your work, that a third party working for us, or a Laine employed Team Member asks to be treated as a self-employed contractor, but without any material changes to their working conditions.
- A supplier or other subcontractor is paid gross when they should have been paid net, under a scheme such as the Construction Industry Scheme.
- A third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business.
- A third party to whom we have provided services requests that their invoice is addressed to a different entity, where we did not provide services to such entity directly.
- A third party to whom we have provided services asks us to change the description of services rendered on an invoice in a way that seems designed to obscure the nature of the services provided.
- You receive an invoice from a third party that appears to be non-standard or customised.
- 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.

- You notice that we have been invoiced for a commission or fee payment that appears too large or too small, given the service stated to have been provided.
- A third party requests or requires the use of an agent, intermediary, consultant, distributor, or supplier that is not typically used by or known to us.

POLICY REVIEW

Laine reviews the Anti-Tax Evasion Policy annually and we will ask that all team members make a declaration of compliance with this Policy.

Version Number	Author	Purpose/Change	Date
1	Laura Creasey		July 2023

The image is a vibrant, abstract graphic design. It features a bright yellow background. Scattered across the background are various geometric shapes and patterns: blue and white diagonal stripes, solid blue and white triangles, and clusters of small white and blue dots. The word "LAINE" is prominently displayed in the center in a bold, black, hand-drawn font, enclosed within a thick black rectangular border.

LAINE