



Criminal Finances Act 2017 – Prevention of Tax Evasion Facilitation Policy

1. Policy Statement

GEODEC Limited is committed to conducting business ethically, transparently, and in full compliance with all applicable UK tax laws.

The Company adopts a zero-tolerance approach to tax evasion and the criminal facilitation of tax evasion, whether under UK law or foreign law.

This policy is established in accordance with the Criminal Finances Act 2017, which introduced corporate criminal offences for failing to prevent the facilitation of tax evasion by persons acting on behalf of an organisation.

GEODEC Limited will not tolerate any activity that supports, enables, assists, or facilitates tax evasion in any form.

2. Scope

This policy applies to all persons and entities associated with GEODEC Limited, including but not limited to:

- Directors and officers
- Employees (if applicable)
- Subcontractors and labour-only operatives
- Agents, consultants, and suppliers
- Any individual or organisation acting on behalf of GEODEC Limited

3. Definitions

- Tax evasion: The deliberate and dishonest non-compliance with tax obligations.
- Facilitation of tax evasion: Any action that knowingly or dishonestly assists another person to evade tax.
- Associated person: Any individual or entity performing services for or on behalf of GEODEC Limited.

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Company Number: 16851519
VAT Number: 507501225
Registered in England and Wales



4. Prohibited Conduct

The following actions are strictly prohibited:

- Knowingly assisting or encouraging tax evasion
- Falsifying invoices, records, or financial information
- Paying or receiving undeclared cash payments
- Misrepresenting employment or subcontractor status
- Assisting others to conceal income or evade tax liabilities
- Ignoring or failing to report suspected tax evasion

Any breach of this policy may result in immediate termination of contracts and referral to appropriate authorities where required.

5. Prevention Procedures and Controls

GEODEC Limited has implemented reasonable and proportionate procedures to prevent tax evasion facilitation, including:

5.1 Due Diligence

- Verification of subcontractor identity and right to work
- CIS registration checks where applicable
- Confirmation of VAT status where relevant
- Use of written contracts outlining tax responsibilities

5.2 Financial Controls

- Accurate record-keeping of income and expenditure
- Use of professional accountants for tax and financial compliance
- No acceptance or issuance of false or misleading documentation
- No cash payments intended to conceal tax liabilities

5.3 Contractual Safeguards

- Contracts require lawful conduct and compliance with tax legislation
- Right to terminate engagement where non-compliance is identified

5.4 Governance and Oversight

- Director-level oversight of financial and contractual matters
- Regular review of business practices to identify risk
- Immediate investigation of any concerns raised

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6. Reporting Concerns

Any individual associated with GEODEC Limited who becomes aware of, or suspects, tax evasion or facilitation must report it immediately to the Director.

Reports will be handled confidentially, and no individual will suffer retaliation for raising a genuine concern in good faith.

7. Breach of Policy

Breaches of this policy may result in:

- Immediate termination of contracts or engagement
- Disciplinary action (where applicable)
- Reporting to HMRC or other relevant authorities

GEODEC Limited reserves the right to take all necessary action to protect the Company and comply with legal obligations.

8. Training and Awareness

GEODEC Limited ensures that directors and those responsible for engaging subcontractors understand their obligations under the Criminal Finances Act 2017.

Formal training will be introduced if the size or risk profile of the business increases.

9. Review and Monitoring

This policy will be:

- Reviewed annually
- Updated as necessary to reflect legislative changes or business growth
- Made available to relevant parties upon request

10. Policy Approval

This policy has been approved by the Director of GEODEC Limited and is effective immediately.

Signed By

George Ryan Matthews

25th November 2025

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