



TIMESING

HONEST SUPPORT, PRECISE ADVICE.

ANTI-TAX EVASION FACILITATION POLICY



1 Introduction

TIMESING is committed to conducting all business activities honestly, ethically and in compliance with all applicable laws and regulations.

We have a zero-tolerance approach to tax evasion and the criminal facilitation of tax evasion. We are committed to preventing any person acting on behalf of TIMESING from engaging in conduct that could constitute the facilitation of tax evasion.

This policy sets out the responsibilities of employees, directors, consultants, contractors, suppliers and other associated persons in preventing tax evasion facilitation and complying with the Criminal Finances Act 2017.

2 Purpose

The purpose of this policy is to:

- Ensure compliance with the Criminal Finances Act 2017.
- Prevent the criminal facilitation of tax evasion.
- Promote ethical and lawful business practices.
- Protect TIMESING, its employees and associated persons from legal and reputational harm.
- Establish clear procedures for identifying and reporting concerns.
- Demonstrate TIMESING's commitment to responsible corporate behaviour.

3 Scope

This policy applies to:

- Directors.
- Employees.
- Consultants.
- Contractors.
- Agency workers.
- Suppliers.
- Business partners.



- Any other person performing services for or on behalf of TIMESING.

All persons within the scope of this policy are expected to comply fully with its requirements.

4 Tax Evasion and Tax Evasion Facilitation

Tax evasion is the deliberate and dishonest non-payment or underpayment of taxes that are legally due.

Tax evasion is a criminal offence.

Tax evasion facilitation occurs when a person knowingly assists, encourages, aids, abets, counsels or procures another person to evade tax.

Under the Criminal Finances Act 2017, a company may commit an offence where an associated person criminally facilitates tax evasion whilst acting on behalf of the company.

The legislation applies to both:

- UK tax evasion offences; and
- Foreign tax evasion offences where equivalent conduct would constitute an offence in the United Kingdom.

5 Prohibited Conduct

TIMESING strictly prohibits any person acting on its behalf from:

- Assisting another person to evade tax.
- Concealing income, profits or assets from tax authorities.
- Creating false invoices or financial records.
- Knowingly facilitating inaccurate tax declarations.
- Assisting in the concealment of taxable income.
- Encouraging any person to avoid lawful tax obligations.
- Ignoring known or suspected tax evasion activities.
- Participating in any arrangement intended to unlawfully reduce or avoid tax liabilities.

Any breach of this policy will be treated seriously.



6 Reasonable Prevention Procedures

TIMESING is committed to maintaining reasonable procedures designed to prevent the facilitation of tax evasion.

These procedures include:

- Appropriate due diligence on clients, suppliers and contractors.
- Compliance with anti-money laundering procedures.
- Maintaining accurate books and records.
- Segregation of financial responsibilities where appropriate.
- Monitoring unusual or suspicious transactions.
- Maintaining reporting procedures for concerns.
- Providing policy awareness to relevant personnel.

TIMESING will review its procedures periodically to ensure they remain appropriate and effective.

7 Risk Areas

The following situations may indicate an increased risk of tax evasion facilitation:

- Requests for payments to be made to third parties without legitimate explanation.
- Requests for payments to offshore accounts without commercial justification.
- Requests for cash payments.
- Requests for false invoices or amended invoices that do not reflect the actual services provided.
- Requests to conceal the identity of a beneficial owner.
- Unusual payment arrangements.
- Transactions that appear inconsistent with normal business practices.

Employees and suppliers should exercise caution and seek guidance whenever concerns arise.



8 Responsibilities

8.1 Directors

The Directors are responsible for:

- Promoting a culture of compliance and ethical conduct.
- Ensuring adequate procedures are maintained.
- Investigating reported concerns.
- Reviewing this policy periodically.

8.2 Employees and Suppliers

Employees and suppliers are responsible for:

- Complying with this policy.
- Remaining alert to the risks of tax evasion facilitation.
- Reporting concerns promptly.
- Maintaining accurate records.
- Cooperating with any investigation.

No employee or supplier will be criticised or disadvantaged for refusing to participate in any activity they reasonably believe may constitute tax evasion facilitation.

9 Reporting Concerns

Any employee, consultant, contractor or supplier who becomes aware of actual, suspected or attempted tax evasion or tax evasion facilitation must report the matter immediately.

Reports should be made to:

Laila Pacheco (Administrative Director)

All reports will be treated confidentially so far as reasonably practicable and will be investigated appropriately.

Individuals raising genuine concerns in good faith will not suffer detrimental treatment.



10 Breaches

Any breach of this policy may result in:

- Disciplinary action up to and including dismissal.
- Termination of contractual arrangements.
- Reporting to law enforcement or regulatory authorities.
- Civil or criminal proceedings.

TIMESING reserves the right to take appropriate action where any breach of this policy is identified.

11 Related Policies

This policy should be read in conjunction with the following TIMESING policies:

- Anti-Bribery Policy.
- Anti-Money Laundering Policy.
- Whistleblowing Policy.
- Competition Law Policy.
- Corporate Social Responsibility Policy.

12 Implementation, Maintenance and Review

This policy will be reviewed annually or when there is a change in circumstances, in work practices or the introduction of new legislation.

This statement has been approved & authorised by:

Name: Paschal Walsh
Position: Managing Director
Date: 1 September 2024