

Anti-Facilitation of Tax Evasion Policy

Purpose

The purpose of this policy is to set out the responsibilities Gold Group and its employees has to ensure business is conducted in an honest, lawful and ethical manner.

We have a zero-tolerance attitude to the facilitation of tax evasion, whether it be under the Criminal Finance Act here in the UK or the equivalent in any other country. This policy provides guidance on how to recognise and avoid tax evasion.

Scope

This policy applies to all persons working for Gold Group or on our behalf in any capacity, including employees at all levels including Directors, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, regardless of location.

Policy

The prevention, detection and reporting of tax evasion and foreign tax evasion are the responsibility of all those working for Gold Group or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

An explanation of this policy forms part of the induction process for all individuals who work for us, and training will be provided on it periodically.

The contents of this policy is to be shared with all suppliers, contractors and business affiliates at the beginning of our working relationship.

Any employee 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.

You must notify the Directors immediately if you suspect or witness that a breach with this policy has occurred, or may occur in the future. For example, if an employee or supplier asks to be paid into an offshore bank account, without good reason, or a supplier asks to be paid in cash, indicating that this will mean the payment is not subject to VAT. Listed below are some examples that may indicate potential tax evasion or foreign tax evasion are set out below.

- 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.
- A third party requests 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 requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.

If you become aware of any fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person in the course of your work, or you are asked to assist another person in their fraudulent evasion of tax (whether directly or indirectly), or if you believe or suspect that any fraudulent evasion of tax has occurred or may occur, you must notify the Directors or follow the Whistle Blowing Policy as a matter of urgency.

If you have any doubt that the act in question is or is not classed as tax evasion then please consult with your Manager or the Directors. Please be aware that “turning a blind eye” can also be considered as criminal facilitation of tax evasion

Do not notify the persons involved or suspected that you have reported or intend to report the activity.

Gold Group operate an open and supportive environment and you will not be made to feel uncomfortable or threatened should you raise a concern or make a report. If you feel at any point that you have received detrimental treatment as a result of refusing to be a party to tax evasion activities or from raising a concern or making a report, then you must refer to the Grievance policy laid out in the Employee Handbook.