



# ANTI-TAX EVASION POLICY

## Introduction

The Skillcast Group plc (the "Group") is committed to Anti-Tax Evasion Policy for preventing the facilitation of tax evasion in accordance with Part 3 of the Criminal Finances Act 2017.

This Anti-Tax Evasion Policy applies to all Directors and Employees of the Group and all persons working for us or on our behalf, including agents, contractors, and external consultants. It has been designed to ensure that Directors and Employees do not misuse, or place themselves under suspicion of misusing, information about the Group they have, which is not public.

Any employee who breaches this Anti-Tax Evasion Policy will face disciplinary action, resulting in dismissal for gross misconduct. Any non-employee who breaches this Anti-Tax Evasion Policy may have their contract terminated immediately.

## What is the facilitation of tax evasion?

Facilitation of Tax Evasion means being knowingly involved in or aiding, abetting, counselling or procuring the commission for the evasion of taxes in the UK tax or any country by anyone. Facilitation of tax evasion, where it is done deliberately and dishonestly, is a criminal offence in the UK.

Tax Evasion means an act of fraudulently evading UK tax by deliberate action or omission with dishonest intent.

Tax means all forms of UK taxation, including but not limited to corporation tax, income tax, VAT, stamp duty, national insurance contributions and their equivalents in any non-UK jurisdiction

Tax evasion is not the same as tax avoidance or tax planning, which involves steps allowed under the law to minimise tax payable or maximise tax relief - this is legal.

## Prevention of tax evasion

All forms of tax evasion are strictly prohibited by the Group. All Directors and Employees are prohibited from aiding the Group, an employee, a supplier, a customer, or any third party to evade taxes.

Any Director or Employee who is unsure whether a particular act constitutes facilitation of tax evasion should raise it with the CEO or Chairman of the Group.

This Anti-Tax Evasion Policy does not prohibit taking steps to help the Group, an employee, a supplier, or a customer avoids taxes within the statutes of the tax law and legitimate exemptions and reliefs provided.

All Directors and Employees must submit all customer and supplier invoices and expenses claims under our Expenses Policy and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties, including suppliers and customers, should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

Any Director or Employee who is aware, or you suspect, that facilitation of tax evasion or another breach of this Anti-Tax Evasion Policy has occurred or may occur, you must notify a Director or report it as per our Whistleblowing Policy as soon as possible.

All Directors and Employees are prohibited from threatening or retaliating against another person who has refused to facilitate tax evasion or has raised concerns about the possible facilitation of tax evasion.