

ANTI-FACILITATION OF TAX EVASION POLICY

Applicability

1. The Anti-facilitation of Tax Evasion Policy ("ATE Policy") applies to all persons working for or with RA, its subsidiaries, and joint ventures worldwide. This includes:
 - 1.1 employees at all levels, directors, managers, agency workers, seconded workers, volunteers and interns, and
 - 1.2 all associated persons, which includes anyone who performs services for or on behalf of RA, such as partners, suppliers, consultants, intermediaries, agents, distributors, advisors, business contacts and any third-party representatives together ("Associated Persons").

Policy Statement

2. It is RA's policy to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to tax evasion or any actions that facilitate tax evasion, whether under UK law or under the law of any other jurisdiction.
3. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. To this end we implement and enforce effective systems to counter the facilitation of tax evasion.
4. We will comply with all laws relevant to countering tax evasion, in all the jurisdictions in which we operate, including the UK Criminal Finances Act 2017.
5. The purpose of the ATE Policy and Procedures is to:
 - 5.1 set out our responsibilities, and of those working with us, in observing and upholding our position on preventing the criminal facilitation of tax evasion; and
 - 5.2 provide information and guidance to those working for us on how to recognize and avoid tax evasion.
6. If we fail to prevent our employees or associated persons from facilitating tax evasion, we can face criminal sanctions including fines, exclusion from tendering for contracts and damage to our reputation. We, therefore, take our legal responsibilities very seriously.

Applicable Definitions

7. Tax evasion means the offence of cheating the public revenue or fraudulently evading UK tax, and is a criminal offence. The offence requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent.
8. Foreign tax evasion means evading tax in a foreign country, provided that 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.
9. The facilitation of tax evasion means being knowingly concerned in, or taking steps with a view to, the 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.
10. Tax evasion facilitation is a criminal offence, where it is done deliberately and dishonestly.

11. Under the UK 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 acting in the capacity of an "Associated Person" to that body.
12. For the offence to be made out, the Associated Person must deliberately and dishonestly take action to facilitate the tax evasion by the taxpayer. If the Associated Person accidentally, ignorantly, or negligently facilitates the tax evasion, then the corporate offence will not have been committed. The company does not have to have deliberately or dishonestly facilitated the tax evasion itself; the fact that the Associated Person has done so creates the liability for the company.
13. 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 minimize tax payable (or maximize tax reliefs).
14. Third party means any individual or organization you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisers, representatives and officials, politicians and political parties
15. "You" or "Your" refers to all RA Associated Persons.

What You Must Not Do

16. Under the ATE policy you must not:
 - 16.1 engage in facilitating tax evasion or facilitating foreign tax evasion;
 - 16.2 aid, abet, counsel or procure the commission of a tax evasion offence or foreign tax evasion offence by another person;
 - 16.3 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 another country), or any suspected fraudulent evasion of tax (whether UK tax or tax in another country) by another person, in accordance with this policy;
 - 16.4 engage in any other activity that might lead to a breach of this policy, or
 - 16.5 retaliate (or threaten to retaliate) against another individual who had refused to commit a tax evasion offence or a foreign tax evasion offence or who has raised concerns under this policy.

What You Must Do

17. You are responsible for the prevention, detection and reporting of tax evasion and foreign tax evasion.
18. You must:
 - 18.1 read, understand and comply with this policy;
 - 18.2 avoid any activity that might lead to, or suggest, a breach of this policy.
19. You must notify your line manager/RA contact as soon as possible if you believe or suspect that conflict with this policy has occurred or may occur in the future.

Reporting/Raising a Concern

20. If you are an employee you are encouraged to raise concerns about any issue or suspicion of tax evasion or foreign tax evasion with your line manager at the earliest possible stage. If you are an Associated Person, please raise any concerns you have with your main RA contact.
21. If you become aware of evasion of tax (whether UK tax or tax in another 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 evasion of tax has occurred or may occur, whether in response of UK tax or tax in any other country, you must make a report.
22. You may also report concerns with conduct covered by the ETA policy to RA Compliance Manager.

Protection

23. Individuals who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
24. We are committed to ensuring no one suffers any detrimental treatment as a result of:
 - 24.1 refusing to take part in, be concerned in, or facilitate tax evasion or foreign tax evasion by another person;
 - 24.2 refusing to aid, abet, counsel or procure the commission of a tax evasion offence or a foreign tax evasion offence by another person; or
 - 24.3 reporting in good faith their suspicion that an actual or potential tax evasion offence or foreign tax evasion offence has taken place or may take place in the future.
25. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager or the Compliance Manager.

Breaches of this Policy

26. Breaches of this policy will be deemed misconduct or gross misconduct, depending on their severity.
27. We may terminate our relationship with other Associated Persons (including individuals and organizations working on our behalf) if they breach this policy.

Training and Communication

28. Training on this policy forms part of the induction process for all employees, and regular training will be provided as necessary and at the discretion of country managers.
29. Our zero-tolerance approach to tax evasion and foreign tax evasion must be communicated to all suppliers, contractors and business partners and other Associated Persons at the outset of our business relationship with them and as appropriate after that.

Red Flags

30. The following is a list of possible red flags that may arise during the course of your working with 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:

- 30.1 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
 - has failed to register with the relevant tax authority
 - has delivered or intends to deliver a false document relating to tax
 - has set up or intends to set up a structure to try to hide income, gains or assets from a tax authority;
- 30.2 you become aware, in the course of your work, that a third party has deliberately failed to register for or make a declaration regarding applicable tax, such as income tax or import tax;
- 30.3 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;
- 30.4 you become aware, in the course of your work, that a third party working for us as an employee asks to be treated as a self-employed contractor, but without any material changes to their working conditions;
- 30.5 a supplier or other subcontractor is paid gross when they should have been paid net;
- 30.6 a third-party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- 30.7 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;
- 30.8 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;
- 30.9 you receive an invoice from a third party that appears to be non-standard or customized;
- 30.10 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;
- 30.11 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;
- 30.12 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.



Soraya Narfeldt
CEO

Policy Implementation/ Review Date	Next Policy Review Date
January-2026	January-2027

