

ANTI-FACILITATION OF TAX EVASION POLICY STATEMENT

1. Purpose and scope

The purpose of this policy is to outline a framework to prevent tax evasion and the facilitation of tax evasion within J Coffey Construction Limited. This policy applies to all employees, directors, contractors, consultants, temporary workers, and anyone working on behalf of J Coffey Construction Limited.

2. Legal framework

Under the **Criminal Finances Act 2017**, it is an offence for any organisation to fail to prevent the facilitation of tax evasion by an associated person.

As an employer, if we fail to prevent our employees, workers, agents, or service providers from facilitating tax evasion, we can face criminal sanctions including an unlimited fine, as well as exclusion from tendering for public contracts and damage to our reputation. We therefore take our legal responsibilities seriously.

J Coffey Construction Limited is committed to taking reasonable steps to prevent the facilitation of tax evasion. This policy outlines the steps taken by J Coffey Construction Limited to comply with the Act and mitigate the risk of tax evasion.

2.1 What is tax evasion and tax evasion facilitation?

Tax evasion is illegal and can have significant consequences for us as an employer, as well as our employees and associated persons.

- **Tax Evasion** refers to the offence of cheating the public revenue or fraudulently evading UK tax. It is a criminal offence that requires an element of fraud, meaning there is deliberate action or omission of information with dishonest intent.
- **Foreign Tax Evasion** occurs when taxes are evaded in a foreign country, providing the conduct is an offence in that country and would be a criminal offence if it was committed in the UK. It also contains an element of fraud through deliberate action or omission with dishonest intent.
- **Facilitation of Tax Evasion** means being knowingly involved in the fraudulent evasion of tax, either in the UK or in a foreign country, by another person, and aiding, abetting, procuring or in any way enabling the commission of that offence. Deliberate and dishonest facilitation of tax evasion is a criminal offence.

3. Policy statement

It is our policy to conduct all business in an honest and ethical manner. J Coffey Construction Limited has a zero-tolerance approach to tax evasion and is committed to complying with all relevant tax laws, including those set out in the **Criminal Finances Act 2017**, **UK Anti-Money Laundering Legislation**, and other applicable tax regulations.

We will not tolerate:

- Any form of tax evasion or facilitation of tax evasion.
- Employees, contractors, or any other associated persons engaging in or facilitating tax evasion, either directly or indirectly.
- Any attempt to conceal or hide tax evasion activities.

All employees and associated persons of J Coffey Construction Limited must comply with this policy and report any concerns regarding potential violations.

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4. Responsibilities

4.1 Responsibilities of senior management

Senior Management is responsible for the overall implementation of this policy, ensuring the organisation complies with all tax-related laws and regulations.

4.2 Responsibilities of the HR department

The HR Department will ensure that all employees are aware of the policy, receive relevant training, and understand their obligations, and will communicate any changes.

4.3 Responsibilities of finance and compliance teams

Finance and Compliance Teams are responsible for monitoring financial transactions, ensuring that proper records are kept, and reporting any suspicious activity related to tax evasion.

4.4 Responsibilities of management

Team managers and heads of department will ensure departmental adherence to the Tax Evasion Policy; identify risks and allocate resources at the local level.

4.5 Responsibilities of all personnel

All employees, contractors, and associated persons are expected to act in compliance with this policy and to avoid engaging in or facilitating any activities related to tax evasion. All such personnel are required to report any suspicions of tax evasion, fraud, or other illegal activity to their line manager, compliance office or through the appropriate whistleblowing channels if you suspect that this policy has been breached, or that a breach may occur in the future.

All such personnel must not:

- Engage in any form of facilitating tax evasion, either in the UK or overseas.
- Aid, abet, procure or in any way enable the commission of a tax evasion offence, either in the UK or overseas
- Fail to promptly report any request or demand from a third party to facilitate the fraudulent evasion of tax, or any suspicion of fraudulent evasion of tax by another person, either in the UK or overseas
- Threaten, retaliate against or obstruct another individual who has refused to commit a tax evasion offence, a foreign tax evasion offence, or the facilitation of either of these offences, or who has raised concerns under this policy.

5. Preventative measures

J Coffey Construction Limited has implemented the following measures to prevent the facilitation of tax evasion:

5.1 Training

Senior employees, especially those involved in finance, procurement, sales, or customer relations, will receive regular training on identifying and reporting potential tax evasion or facilitation of tax evasion.

5.2 Due diligence

We will conduct appropriate due diligence when dealing with customers, suppliers, contractors, and other third parties to ensure they comply with legal tax obligations.

5.3 Internal controls

We will maintain and regularly review internal controls, including financial and reporting systems, to ensure the detection of any suspicious activity that could indicate facilitation of tax evasion.

5.4 Monitoring and auditing

Regular audits will be conducted to detect and prevent any illegal activities related to tax evasion.

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5.5 Whistleblowing

Employees and other associated persons are encouraged to report any concerns about potential tax evasion or facilitation of tax evasion using our confidential whistleblowing procedures.

5.6 Red flags of potential tax evasion

The following is a list of possible red flags of tax evasion or foreign tax evasion employees may encounter during the course of business. It is not intended to be an exhaustive list and should be used for illustrative purposes only:

- A third party makes a false statement concerning their tax, fails to disclose income or other gains to the relevant tax authority, delivers a false document relating to tax, or sets up a structure to try to hide income, assets or other gains from a tax authority, or intends to do any of the above
- Frequent cash transactions that are not recorded or reported for tax purposes
- Large discrepancies between reported income and expected earnings based on business activity or industry standards
- Claiming excessive or unusual deductions, such as personal expenses that have been falsely classified as business-related
- Lack of proper documentation or unclear expense records that are inconsistent with the nature of the business
- Frequent transfers of large sums of money to individuals or accounts that don't seem directly related to the business
- Use of multiple shell companies, offshore accounts, or entities in low-tax jurisdictions to hide income or shift assets
- Business or personal accounts that are poorly maintained or inconsistent with the business' revenue flow
- Repeated corrections or changes to previously reported figures without clear explanation
- Large loans or transfers of money that aren't properly documented or reported, which could conceal taxable income
- Loans that lack formal agreements or are structured to avoid tax reporting
- Frequent reclassifications, restatements, delays or last-minute changes to tax filings or books, especially near filing deadlines
- The use of convoluted financial instruments or structures solely for the purpose of minimising taxes, with little legitimate business purpose
- Reporting excessive losses year after year, which can reduce taxable income significantly, without a clear economic justification
- Submitting false claims for tax credits, such as for charitable donations or tax-deferred investments, without proper documentation

6. Reporting concerns

All employees, directors, contractors, consultants, temporary workers, and anyone working on behalf of J Coffey Construction Limited should report any suspicions of tax evasion or facilitation of tax evasion to their line manager, the HR Department, or through the designated whistleblowing channels as promptly as possible upon establishing a concern. Any concerns will be treated seriously and investigated promptly.

6.1 Reporting internally

Suspicious of tax evasion can be reported internally through the following channels:

- **Line Manager**
- **Financial Director**
- **Whistleblowing Policy:** Employees may also refer to the organisation's Whistleblowing Policy for guidance on how to raise concerns confidentially.

7. Consequences of non-compliance

Failure to comply with this policy may result in disciplinary action, up to and including dismissal, in accordance with J Coffey Construction Limited's disciplinary procedures.

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Any employee found to be directly or indirectly involved in facilitating tax evasion will face disciplinary action, which may include termination of employment, legal action, and financial penalties. Additionally, the organisation will report any such activity to the relevant authorities and cooperate with all investigative requirements.

In cases where an individual is found to be involved in tax evasion or facilitating tax evasion, criminal or civil sanctions may apply under the **Criminal Finances Act 2017** or other relevant laws.

8. Leadership and accountability

The leadership team at J Coffey Construction Limited is responsible for ensuring that this policy is adhered to and that adequate resources and training are provided to prevent tax evasion. The Financial Director will oversee compliance with this policy and ensure any reported incidents are handled appropriately.

9. Monitoring and review

This policy will be reviewed annually by the Financial Director or sooner if required by changes in relevant legislation or internal operational requirements. The review process will ensure this policy's continued relevance and effectiveness, and that the organisation remains compliant with evolving legal standards and best practices.

10. Communication and contact information

10.1 Communication

This policy will be communicated to all employees and associates of J Coffey Construction Limited and will be made available on the company's intranet or shared platforms. New employees will be informed of this policy during their induction process.

This policy statement applies to all employees and other personnel engaged in J Coffey Construction operations:

Signed: *Eddie Barrett* (Original Signed)

Date: 21/10/2025

Eddie Barrett

Group Managing Director

On behalf of J. Coffey Construction

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