



## 1.0 Introduction

On 30<sup>th</sup> September 2017, the Criminal Finances Act 2017 (the Act) came into force to demonstrate the UK Government's commitment to preventing tax evasion in all its forms. The UK Government believes that companies and partnerships should be criminally liable where they fail to prevent those who act for them, or on their behalf, from criminally facilitating tax evasion. As a result, it has created a new corporate offence of failing to prevent the facilitation of tax evasion.

STREIF UK could face prosecution under the Act if it fails to have reasonable procedures in place to prevent the facilitation of tax evasion. There are serious criminal penalties for committing an offence under the Act. Additionally, conviction will have serious consequences for our reputation and business relationships.

STREIF UK is committed to the prevention, deterrence, and detection of criminal tax evasion and the criminal facilitation of tax evasion. It is our policy to conduct all our business dealings in an honest and ethical manner. The policy statement governs all of our business dealings and the conduct of all persons and organizations who are appointed to act on our behalf.

We request all our staff members and all those who have (or seek to have) a business relationship with STREIF UK to familiarize themselves with our anti-tax evasion policy statement and to act at all times in a manner which is consistent with our Anti-Facilitation of Tax Evasion Policy.

## 2.0 Anti Tax Evasion Policy Statement

STREIF UK has a zero tolerance approach to all forms of tax evasion, whether under current UK law or under the law of any foreign state. All staff members and associates of STREIF UK must not undertake any transactions which:

- ◆ Cause STREIF UK to commit a tax evasion offence: or
- ◆ Facilitate a tax evasion offence by a third party who is not an associate of STREIF UK

STREIF UK is committed to acting professionally, fairly and with integrity in all our business dealings and relationships, and implementing and enforcing effective systems to counter tax evasion facilitation. At all times, business should be conducted in a manner such that the opportunity for, and the incidence of, tax evasion is prevented.

The Policy applies to all persons working for (or on behalf of) STREIF UK in any capacity, including staff members at all levels, directors, officers and associates including (but not limited to) agency workers, contractors, external consultants, third party representatives and business partners or any person associated with us, wherever located.

## 3.0 Legal Obligations

*Tax Evasion* means an offence of cheating the public revenue or fraudulently evading UK tax, and it is a criminal offence. The offence requires an element of fraud, which means there must be deliberate action, or omission, with dishonest intent. Tax evasion is committed where a person knowingly takes steps to fraudulently reduce the amount of tax they should otherwise have paid.

*Facilitation of Tax* Facilitation means being knowingly concerned in, or actively taking steps to fraudulently evade tax, whether UK tax or tax in a foreign country by another person, or aiding, abetting, or counselling the commission of that offence. Tax evasion facilitation is a criminal offence, where it is done deliberately and dishonestly. This means that a company may also have committed an offence if the person has criminally facilitated the tax evasion while acting in their capacity as an associate of a company.

The person who knowingly facilitates tax evasion can be as guilty as the person who evades the tax. A company may still be guilty of an offence under UK law even if the facilitation activity is committed overseas and, if UK tax is evaded, irrespective of whether it would be illegal under local law. If the facilitation activity takes place in the UK or concerns a UK company, branch, person or other entity, the offence will in certain circumstances extend to cover the evasion of tax in jurisdictions other than the UK.

Fraudulent tax evasion and the deliberate and dishonest facilitation of fraudulent tax evasion are criminal offences and STREIF UK will, in appropriate circumstances, bring any such activity that it identifies to the attention of the relevant authorities.

## 4.0 Company Responsibilities

STREIF UK has identified a number of ways in which employees involved in procurement, negotiating contracts and producing or settling invoices for customers or suppliers could be encouraged to become involved in the criminal facilitation of tax evasion, including (but not limited to) false invoicing schemes, fraudulent VAT transactions, employment, consultancy or agency arrangements designed to evade tax, and artificial and contrived contracts and transactions.

STREIF UK prohibits the involvement of its employees and its associates in all such criminal activity and encourages all to be aware of this risk, and to report any concerns that that this Policy is being breached. Employees and associates should be mindful of the following factors that might indicate that a contractual arrangement or transaction is being used for the fraudulent evasion of tax:

- ◆ Requests to make or receive payments in cash rather than through an account with a recognized bank;
- ◆ Requests to make or receive payments in a jurisdiction with which the other contracting party does not have a connection, particularly those with a low tax transparency rating;
- ◆ High value, multi-jurisdictional transactions;
- ◆ Transactions or invoices sent to non-UK-resident customers, particularly to those resident in jurisdictions with a low tax transparency rating;
- ◆ Non face-to-face business relationships/ transactions and contractual arrangements involving multiple third parties or intermediaries where the reason for this is unclear;
- ◆ Requests from third parties to enter into contractual or invoicing arrangements where you know or suspect that the arrangement will be used to enable fraudulent evasion of tax.

STREIF UK will provide ongoing training to its employees to identify and erase potential tax evasion activities, and to carry out risk assessments on a regular basis particularly with regard to new operating environments.

Any employee or associate of STREIF UK who knows or suspects that other individuals are providing assistance in breach of this Policy (or if you identify suspicious transactions or invoices that may be in breach of this Policy) should speak to their manager as soon as possible.

# Anti-Facilitation of Tax Evasion Policy



All matters raised will be dealt with in strict confidence and no employee or associate will suffer any adverse consequence for refusing to engage in the facilitation of tax evasion or for reporting instances in which you suspect that this Policy has been breached, even if this may result in STREIF UK losing business.

All managers are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it.

The Board of Directors of STREIF UK has overall responsibility for ensuring that this Policy complies with our legal obligations, and that our staff members and associates comply with it. The Policy will be monitored and reviewed on a regular basis according to ongoing risk assessments and changes to UK law. It may be varied at any time at the discretion of the Board of Directors.

A handwritten signature in blue ink, appearing to read "Bill Treves".

**Bill Treves**  
*Managing Director*