

# **Corporate Criminal Offence Policy**

#### DISTRIBUTION

This Corporate Criminal Offence Policy is communicated to all employees. A copy is available at the Head Office, held in the sites folder, and published on the internal company shared drive. All employees are encouraged to read it and communicate any queries to a Director.

#### **REVISION HISTORY**

Issue Number	Review Date	Changes	Signed
1	01/03/2023	Original version (draft)	Arstohn
1	01/03/2023	Signed off	Arstohn
2	01/03/2024	Review	Arstohn

The purpose of this policy is to communicate the Triangle Support Services Group LTD to the Corporate Criminal Offence of the Failure to Prevent the Criminal Facilitation of Tax Evasion ("CCO").

A criminal offence is committed under this legislation where an associated person of Triangle Support Services Group LTD Ltd (such as an employee, contractor or agent) deliberately and dishonestly facilitates a taxpayer evading tax, and Triangle Support Services Group LTD has not put in place reasonable preventative procedures.

#### **Key Principles**

Ensuring that we have reasonable prevention procedures in place to prevent any person associated with Triangle Support Services Group LTD from facilitating tax evasion. Our key procedures comprise:

Obtaining assurances and warranties from suppliers that they have reasonable prevention procedures in place.

Providing training to our staff and being clear about the consequences if a person associated with Triangle Support Services Group LTD facilitates tax evasion.

Providing a pathway for reporting wrong doing and providing protection for whistleblowers in line with the company whistle blowing procedure

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Operating existing, and implementing new, procedures which reduce the opportunity for employees to facilitate tax evasion, and regularly reviewing these for effectiveness and improvement.

Adopting a zero-tolerance attitude towards the criminal facilitation of tax evasion.

Where internal investigations indicate a person associated with Triangle Support Services Group LTD has facilitated tax evasion, they will be reported to the authorities and Triangle Support Services Group LTD will fully support prosecution to the fullest extent of the law.

Not to use the services of others who are unable to provide assurance that they have reasonable prevention procedures in place.

### This Policy Applies to:

This policy applies to all persons associated with Triangle Support Services Group LTD, including for employees, contractors, agents, and any person acting on behalf of Triangle Support Services Group LTD.

# Responsibilities

All persons associated with Triangle Support Services Group LTD are responsible for adhering to this policy

All employees / contractors / business partners are responsible for not facilitating tax evasion of taxpayers

Leadership / subject matter teams are responsible for ensuring Triangle Support Services Group LTD fulfils its key principles

The Board is responsible for ensuring appropriate policies are in place and creating a corporate culture that supports compliance

#### **Managing Director**

Name: Arslan Gillani

Sign: Arstahn

Dated: 01/03/2024

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