ANTI-TAX EVASION POLICY

This document sets out the Company rules in relation to identifying and preventing tax evasion, in accordance with the Criminal Finances Act 2017.

The consequences for breaching the Criminal Finances Act are severe and include unlimited financial penalties, confiscation orders, serious crime prevention orders, regulatory issues and reputational damage.

Tax evasion is the illegal non-payment or underpayment of taxes. Facilitation of tax evasion involves being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax by another person.

Any breaches in this policy may result in disciplinary action (up to and including dismissal), termination of contracts with third parties and reports to the relevant authorities.

We will not tolerate the facilitation of tax evasion in any form or circumstance.

Compliance with the Company's Anti-Tax Evasion Policy is regarded as part of our employees' contract of employment. If an employee fails for any reason to follow the rules set out in this document this may result in disciplinary action being taken, which is likely to result in their dismissal.

Compliance with the Company's Anti-Tax Evasion Policy is expected of any persons who perform or will perform services for or on behalf of the business. Failure to comply is likely to result in the suspension of any work or service pending investigation, which may ultimately lead to the withdrawal of any agreement between the parties.

TSM Ltd has put in place processes and procedures to limit the risk of representatives criminally facilitating tax evasion. These are based around the 6 guiding principles, which are:

Risk Management

We use an informal risk assessment approach to identify the risk of facilitation of tax evasion by our associated persons and have established reasonable and proportionate prevention processes to identify and mitigate our tax evasion facilitation risks, of which this policy is a part.

We aim to identify through our risk assessment if employees, agents and those who provide services for us or on our behalf and have motive, opportunity and means to criminally facilitate tax evasion, and the measures and due diligence needed to implement to prevent or minimise this risk.

Tax is paid in accordance with HMRC requirements with an external accountant used to minimise the risk of tax evasion.

Proportionality of Procedures

This is managed through our ISO 9001, 14001, 45001, RISQS certified management systems. Processes are regularly monitored by both internal and external parties.

Top Level Commitment

Commitment is managed via communication during senior management meetings and the implementation and enforcement of this policy.

Due Diligence

TSM Ltd source from and work with reputable and established businesses within the United Kingdom.

Due Diligence is managed via the completion of financial and other checks on new suppliers, contractors and clients prior to orders being placed.

Regular reviews are conducted of our commercial relationships as part of existing contract and supplier reviews.

Communication and Training

ANTI-TAX EVASION POLICY

Clauses are in contracts with employees and external contractors requiring them not to engage in facilitating tax evasion, and to report any concerns.

Awareness training is provided for relevant employees on recognising and preventing financial crime.

Staff are made aware of the POL013 Whistleblowing policy on induction, should a report need to be made. Awareness is raised on how to access confidential whistleblowing services if needed.

Monitoring and Review

This Statement represents our commitment to zero tolerance of the facilitation of tax evasion in any form or circumstance and will be reviewed annually to ensure its continued relevance and adequacy.

Signed:
Position: **Managing Director**
Name: **Lukasz Czerwinski**
Date: **01/07/2026**
Review Date: **01/07/2027**