

Failure to Prevent Tax Evasion Policy

(Criminal Finances Act 2017 – Part 3 Compliance)

1. Purpose of this Policy

Database for Business Ltd (“dbfb”) is committed to conducting business with integrity and in compliance with all applicable laws, including the Criminal Finances Act 2017. Part 3 of the Act creates a Corporate Criminal Offence (CCO) for failing to prevent the facilitation of tax evasion.

2. Scope

This policy applies to all dbfb employees, contractors, partners, and any associated persons performing services for or on behalf of dbfb.

3. What is Tax Evasion and Facilitation?

Tax evasion: A criminal act involving deliberately reducing, avoiding, or not paying taxes legally due.

Criminal facilitation: Knowingly helping or enabling another person to evade tax.

4. dbfb’s Commitment

- Zero-tolerance stance on tax evasion and its facilitation.
- Maintain and enforce prevention procedures.
- Report suspected offences.

5. Reasonable Prevention Procedures

- › Risk Assessment
- › Due Diligence
- › Controls and Procedures
- › Training and Awareness
- › Reporting Concerns (Whistleblowing)

6. Red Flags to Watch For

Examples include cash payment requests, offshore accounts, unusual invoicing, reluctance for due diligence, etc.

7. Responsibilities

Employees must comply and report concerns. Managers must promote compliance. Workplace & Sustainability Director oversees policy.

8. Consequences of Breach

May result in disciplinary action, contract termination, or criminal investigation.

9. Review

Reviewed annually or upon legislative change.