

Form Title: Tax Evasion & Laundering Policy
Form Ref: POL 022
Author: PRB Consulting
Date: June 2026
Version: V2.0



Preventing Facilitation of Tax Evasion & Money Laundering Policy

Summary

This code of conduct summarises the procedures of Role Group Ltd and its subsidiaries to ensure all Role Group Ltd associated persons, including employees and those acting on our behalf, do not facilitate tax evasion.

Policy Statement

Tax evasion, tax fraud and attempts to facilitate such actions are antithetical to the ethos Role Group Ltd. These crimes cheat the government out of revenue it needs to create the conditions for our business to flourish. It amounts to little more than stealing from our customers and from ourselves. Role Group Ltd is committed to no tolerance for tax evasion, and we are committed to a dedicated programme to counter the risk of any employee, contractor, business partner or representative of our company engaging in the criminal facilitation of tax evasion.

We expect everyone who works with our company to fully comply with their tax obligations. We will not tolerate, permit, or allow any person associated with us to engage in the facilitation of tax evasion or tax fraud by any of our customers, suppliers, business partners, contractors, or employees anywhere in the world.

Role Group Ltd is committed to complying in full with the tax laws everywhere we operate, and we choose to do this by respecting not only the letter of the law, but the spirit of the underlying tax policy intent. We aim to pay the right amount of tax at the right time, on all the eligible profits we make.

Our total global tax contribution last year (2025) was circa [REDACTED] which equates to an effective tax rate of circa [REDACTED]. We believe in paying our fair share, and that everyone working with us should too.

Accountability & Governance

The board of our company has approved this policy and our commitment to no tolerance of tax evasion or its facilitation. This director is responsible for monitoring compliance with this policy and is supported by his senior manager.

Employee responsibilities

Our code of conduct sets the standards of behaviour we expect all employees to adhere to. Our employees have a responsibility to take reasonable action to prevent harm Role Group Ltd and we hold our employees accountable for their actions and omissions. Any actions that breach the Criminal Finances Act and the tax laws of wherever we operate brings harm to Role Group Ltd and will not be tolerated.

You are responsible for properly following Role Group Ltd policies and procedures. These should generally ensure that all taxes are properly paid. If you are ever asked by anyone either inside or outside our company to go outside our standard procedures, this should be reported without delay, as someone may be attempting to evade tax.

Any employee who has any concerns relating to any potential breach of this policy must immediately follow our whistleblowing policy and report the matter without delay.

Training & Communication

All employees must familiarise themselves with our prevention of tax evasion training and ensure they have the appropriate level of knowledge for their specific roles. All employees must consider tax evasion-focused communications from senior management and be aware of the latest internal information regarding prevention of tax evasion.

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Our Risk Assessment

Our risk assessment covers the categories of business operations we are involved in where there is a risk of tax evasion.

High risk areas for our business include:	The key factors which may increase risk include	Mitigations that may be applied
Accounts payable	Cash transactions Transactions in certain regions of the world.	<ul style="list-style-type: none"> We only contract with businesses which have good reputations. We ensure all information on an invoice is correct and as expected. We have the full contact details of the supplier and ensure it matches to where the payment is being made. We specify in contracts that VAT and other sales taxes must be added to invoices and have written reasons why such added taxes are not required. We do not pay suppliers in cash. If cash payments must be made, ensure they are properly invoiced, and a receipt is supplied.
Accounts receivable		<ul style="list-style-type: none"> We ensure correct procedures are followed. We do not process off-system invoices. We ensure all invoices have the correct VAT coding.
Payment to contractors		<ul style="list-style-type: none"> Any wage payments outside of payroll must be expressly approved. Where tax is required to be deducted at the source this must be done. Payments to contractors should only be made in strict accordance with company policies. Cash payments should not be made. If they are, invoices and receipts must be present. Any tax related withholdings must be deducted and recorded. Payments without deductions should only be made if there is a reasonable expectation that the recipient will meet their tax obligations.

Our clients [for professional services firms]

Role Group Ltd is committed to the following principles:

- Our relationship with our clients is built on honesty, integrity, mutual trust and a commitment to professionalism.
- Our clients expect us to give the best possible advice and work in their best possible interest.
- Tax evasion is antithetical to who we are as a company and goes against every fibre of our dedication to professionalism in our business.
- We firmly believe that any action which would breach tax laws, or the Criminal Finances Act is not in the best interest of our clients.

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- The advice we give our clients we would give to ourselves, and we endeavour to ensure all advice we give on tax matters is consistent with the law and with HMRC guidance.
- Neither our company or any person associated with our business will give advice to a client that would result in a breach of the Criminal Finances Act, either for Role Group Ltd or our client.
- We do not condone, or support tax evasion and we will not facilitate, give advice or in any way assist our clients to commit tax evasion offences.
- We will not support or work with clients who seek to criminally evade taxes, wherever in the world the tax is owed.

Our commitment

Role Group Ltd is committed to the following principles:

- Our business is carried out fairly, honestly, and openly in every part of our work.
- Our values inform everything we do.
- We will never sell any product or service where we know or suspect that any aspect of the transaction is being misused, abused, or otherwise corrupted for the purposes of tax evasion.
- We will never buy any product or service from any supplier where it is known or suspected that any aspect of the transaction is being misused, abused, or otherwise corrupted for the purposes of tax evasion.
- We will immediately terminate any agreement or business relationship as soon as our company learns of, or suspects tax evasion may be taking place.
- We will not progress any business opportunity where there is any suspicion that any aspect of it may involve tax evasion.
- We will not do business with others who do not also hold to at least the same standard of preventing tax evasion.
- Our company will regularly monitor and review this policy.
- Any employee found in breach of this policy will be subject to disciplinary action.
- We will not tolerate any contractor, business partner, representative or other third party associated with us failing to uphold this policy.
- No employee will suffer demotion, penalty, or any other adverse action for reporting any breach of this policy or from refusing to carry out an action which may lead to a breach of this policy.

Anti-Money Laundering Policy Statement

Introduction

This Anti-Money Laundering (AML) Policy reflects our organisation's commitment to comply with the Proceeds of Crime Act 2002, the Terrorism Act 2000, and the Money Laundering, Terrorist Financing, and Transfer of Funds Regulations 2017 (MLR 2017), along with subsequent amendments. It aims to ensure that all activities and transactions are conducted in compliance with the law to prevent the misuse of the Company's resources for money laundering or terrorist financing.

Scope of the Policy

This policy applies to all employees, contractors, and business partners involved in the Company's operations. It covers all financial transactions, customer engagements, and activities where there is a risk of money laundering or terrorist financing.

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Definition of Money Laundering

Money laundering is the process of disguising the origins of illegally obtained money, typically by passing it through a complex sequence of banking transfers or commercial transactions. The aim is to make the 'dirty' money appear legitimate. This policy also addresses activities linked to terrorist financing.

Responsibilities

All employees are responsible for reporting suspicions of money laundering to the Money Laundering Reporting Officer (MLRO). The MLRO is responsible for evaluating such reports, taking necessary action, and liaising with the National Crime Agency (NCA). Employees must not disclose (or 'tip off') any suspicions to the person(s) involved.

Customer Due Diligence (CDD)

The Company will carry out customer due diligence (CDD) measures, including:

- Verifying the identity of clients and beneficial owners.
- Understanding the purpose of business relationships and transactions.
- Conducting Enhanced Due Diligence (EDD) in high-risk scenarios, such as dealing with Politically Exposed Persons (PEPs).

Training and Awareness

All relevant employees will undergo mandatory annual training on AML regulations, identifying suspicious activity, and reporting procedures. Records of completed training will be maintained.

Record-Keeping and Confidentiality

The Company will retain AML-related records, including CDD documentation and internal reports to the MLRO, for a minimum of five years. All records will be securely stored to ensure confidentiality and compliance with data protection laws.

Monitoring and Review

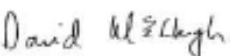
The MLRO will regularly review the effectiveness of the Company's AML procedures and make improvements as needed. This policy will be reviewed annually or when legislative changes occur.

Non-Compliance

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment. Additionally, individuals may face legal penalties under UK AML laws.

Approval and Review

This policy is approved by the Board of Directors and will be reviewed annually or as required. The latest review ensures alignment with the Proceeds of Crime Act 2002, the Money Laundering Regulations 2017, and the UK's obligations under Financial Action Task Force (FATF) standards.

Signed: 

Name: D. McHugh

Role: Managing Director

Date: June 2026