



Anti-Tax Evasion Policy

Introduction

Tax evasion is a criminal offence. Impulse Automation prohibits any form of tax evasion. Involvement in the criminal facilitation of tax evasion exposes a company and the person/s facilitating the evasion to a criminal offence. It will also damage a company's reputation and the confidence of its clients, suppliers and business partners.

Indicators of tax evasion are:

- request for payment by cash;
- overly complex payment mechanisms;
- services/goods provided to jurisdictions that do not subscribe to Common Reporting Standards;
- transactions involving overly complex supply chains;
- transactions involving private banking facilities and/or
- records are incomplete or missing.

Our position is simple: we conduct our business to the highest legal and ethical standards. We will not be a party to tax evasion or the facilitation of tax evasion of any form. Such acts would damage our reputation and expose us, and our staff and representatives, to the risk of fines and imprisonment.

We take a zero-tolerance approach to the facilitation of tax evasion by our people and third-party representatives. We are committed to:

- rejecting the facilitation of tax evasion and
- not recommending the services of others who do not have reasonable prevention procedures in place.

We require compliance from everyone connected with our business. Integrity and transparency are of utmost importance to us.

Definitions of Tax Evasion

Tax evasion is the practice of using illegal methods to avoid paying taxes. It frequently involves contrived, artificial transactions that serve no purpose other than to reduce tax liability.

Policy

It is prohibited, directly or indirectly, for any employee or person working on our behalf to take part in any activity relating to tax evasion.

If it is suspected that a company or person/s have taken part in such activity, an investigation will be carried out and, in line with our procedures where appropriate, action may be taken against that company or person/s, which may result in a dismissal, a legal challenge, or the cessation of business arrangements.



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Reporting

Any employee or person/s working on our behalf suspects any activity related to tax evasion or attempted tax evasion; even if that person/s is not personally involved, the event should be reported to senior staff members.

Training/Monitoring/Review

The company will ensure that it gives all relevant training for staff about financial crime detection and prevention, monitors and enforces compliance with prevention procedures, and regularly reviews the effectiveness of prevention procedures, refining them where necessary.