

I GROUP CORPORATE CRIMINAL OFFENCE POLICY

1. POLICY STATEMENT

The purpose of this policy is to set out Winvic Group's position regarding the Criminal Finances Act 2017. One of the company's core values is to uphold responsible and fair business practices. It is committed to promoting and maintaining the highest level of ethical standards in relation to all its business activities. A reputation for maintaining lawful business practices is of paramount importance and this policy is designed to preserve these values. The company has a zero-tolerance policy towards tax evasion and is committed to acting fairly and with integrity in all its business dealings, relationships and implementing and enforcing effective systems to counter this. The company requires its subsidiaries, affiliates and associated persons to implement and enforce robust and effective systems to support this policy.

2. CRIMINAL FINANCES ACT 2017

The Criminal Finances Act 2017 legislates that a corporate body shall be criminally liable for failing to prevent tax evasion. This means that businesses can be criminally liable where they fail to prevent those who act for, or on behalf of, the business from criminally facilitating tax evasion. This relates to both UK tax and non-UK tax.

Tax evasion relates to any dishonest action intended to purposely declare incorrect tax liabilities.

If it is found a corporate offence has been committed under the act, the company carries the risk of an unlimited fine and significant reputational damage. Non-compliance with the act could result in a criminal investigation by HMRC with any UK prosecutions being brought by the Crown Prosecution Service (CPS).

3. WHO IS COVERED BY THIS POLICY

All subsidiaries, affiliates and associated persons of Winvic Group must comply with this policy.

In this policy, associated person is defined as any person you come into contact with during the course of your work for Winvic and includes but is not limited to:

- employees,
- subcontractors,
- suppliers,
- clients,
- and intermediaries,

whether working for subsidiaries and affiliates of Winvic Group or for third parties.

4. RESPONSIBILITIES

All subsidiaries, affiliates and associated persons are required to:

- prevent those who act for, or on behalf of, the business from criminally facilitating tax evasion;
- report any suspected or actual cases of the facilitation of tax evasion;
- Act honestly, responsibly and with integrity; and
- Safeguard and uphold the company's core values by operating in an ethical, professional and lawful manner at all times.

Any concerns that this policy is not being adhered to by any associated party must be reported to your line manager or a member of the construction or group board as soon as possible.

Overall responsibility and management of this policy is owned by the Winvic Group board. The Board will monitor the effectiveness of the policy and will regularly consider its suitability, adequacy and effectiveness.