

Anti-Tax Evasion Policy

With the introduction of the Criminal Finances Act 2017, two new corporate criminal offences were created, the first applying to the facilitation of UK tax evasion and the second to the facilitation of foreign tax evasion.

Therefore we have put together a policy which will determine that we conduct all of our business dealings in an honest and ethical manner. The policy statement governs all our business dealings and the conduct of all persons or companies who are appointed to act on our behalf.

We request all our employees and all who have, or seek to have, a business relationship with Mathewson and Rosemond, to familiarise themselves with our anti-tax evasion policy and to act at all times in a way which is consistent with this policy.

Anti-Tax Evasion Statement

Mathewson and Rosemond have a zero-tolerance approach to all forms of tax evasion, whether under UK law or under the law of any foreign country.

Employees and those acting on behalf our company must not undertake any transactions which:

- cause the company to commit a tax evasion offence; or
- facilitate a tax evasion offence by any other party working on behalf of the company.

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter tax evasion facilitation.

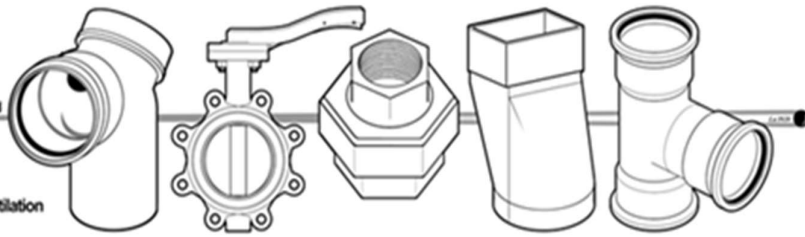
At all times, business should be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented.

Who must comply with this Policy?

This policy applies to all persons working for Mathewson and Rosemond or on our behalf in any capacity, including employees at all levels, directors, managers and all those working on behalf of the company in any capacity.

Who is responsible for this Policy?

The Board and Directors of Mathewson and Rosemond will have overall responsibility for ensuring that this policy complies with our legal obligations, and that our employees and those who are working on behalf of our company comply with it. This policy has been adopted by the company and will be reviewed and updated by the Directors and board at



regular intervals

Employees in leadership positions are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.

What is facilitation of Tax Evasion?

Tax evasion means an offence of cheating the public revenue or fraudulently evading UK tax and is a criminal offence. The offence requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent.

Tax evasion facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, or aiding, abetting, counselling or procuring the commission of that offence. Tax evasion facilitation is a criminal offence, where it is done deliberately and dishonestly.

Tax evasion is not the same as tax avoidance or tax planning. Tax evasion involves deliberate and dishonest conduct. Tax avoidance is not illegal and involves taking steps, within the law, to minimise tax payable (or maximise tax reliefs).

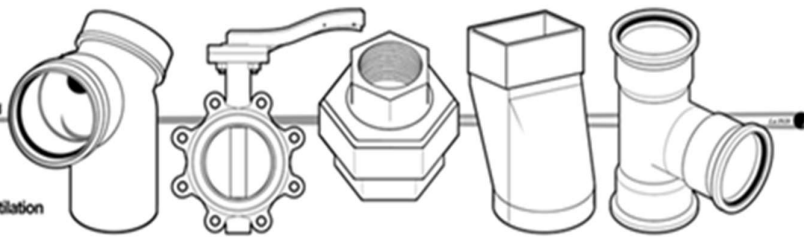
Tax means all forms of UK taxation, including but not limited to corporation tax, income tax, value added tax, stamp duty, national insurance contributions and includes duty and any other form of taxation (however described).

Examples of tax evasion can include (but are not limited to):

- Under-reporting income; or
- Inflating expenses or allowances; or
- Hiding money or not declaring assets; or
- Hiding profits in offshore accounts; or
- Not submitting a tax return.

Indicators of tax evasion can include (but are not limited to):

- Sounds too good to be true; or
- Pay in the form of loans that are not expected to be paid back; or
- High benefits which are disproportionate; or
- Money is moved around in circles; or
- Anything unusual about the way an associate or third party is conducting their relationship with the company; or
- Anything unusual about the associate's or third parties conduct or behaviour in your dealings with them; or
- Any unusual payment methods; or
- A reluctance to provide applicable documentation on request.



Company Responsibilities

Mathewson and Rosemond have completed the necessary actions and are developing procedures governing certain transactions designed to prevent specific areas of possible tax evasion.

We are responsible for offering employees appropriate training to understand tax evasion, and actions to take to prevent tax evasion.

What we must do

Employees and all those working on behalf of Mathewson and Rosemond must at all times adhere to the company's anti-tax evasion policy statement and must ensure that they read, understand and comply with this policy.

What we must not do

- Engage in any form of facilitating tax evasion; or
- Aid, abet, counsel or procure the commission of a tax evasion offence by another person; or
- Fail to promptly report any request or demand from any third party to facilitate the fraudulent evasion of tax by another person, in accordance with this policy; or
- Engage in any other activity that might lead to a breach of this policy; or
- Threaten or retaliate against another individual who has refused to commit a tax evasion offence or who has raised concerns under this policy.

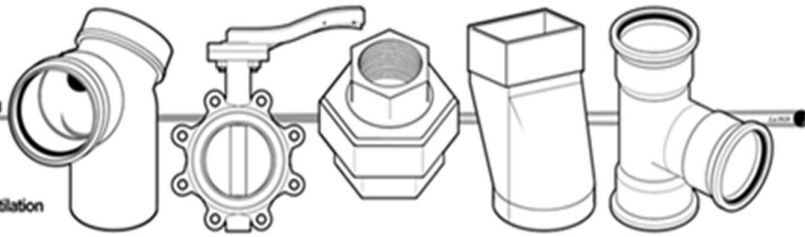
Prevention through awareness

There is not an exhaustive list of tax evasion opportunities. At a more general level, the best defence against tax Evasion and its facilitation sits with our employees and those who may be working on our behalf to adopt a common-sense approach supported by our whistleblowing procedure.

How to raise a concern

Our employees have a responsibility to take reasonable action to prevent harm to the company 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 inevitable harm to Mathewson and Rosemond and will not be tolerated.

Employees are responsible for following Mathewson and Rosemond's policies and procedures and These should ensure that all taxes are paid. If, however, 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.



What happens if an employee prefers not to report their suspicions?

This should never happen. If any employee suspects tax evasion whether actual or intended, the Board and Directors are at risk of being criminally prosecuted, subjected to a large fine and then been publicly named and shamed.