

Prevention of Facilitation of Tax Evasion Policy

Introduction

It is a criminal offence for a person to be knowingly involved in, or take steps with a view to, another person fraudulently evading tax.

Additionally it is a criminal offence for a company to fail to prevent the facilitation of tax evasion.

The law requires that we have in place reasonable prevention procedures to prevent employees and other associates of Peninsula Group companies (*"the Group"*) from engaging in or facilitating tax evasion.

An associate means agents, contractors, suppliers, intermediaries and any other party providing services for or on behalf of the group.

Purpose

The purpose of this policy is to convey to all employees and associates of the Group the rules of the Group and our commitment to taking the strongest possible action against any employee or other party who seeks to deliberately facilitate tax evasion whilst acting on behalf of or in association with any company within the Group.

Scope

This policy applies to all employees of the Group, regardless of seniority or location. It also extends to anyone working on our behalf e.g. those engaged by us to perform services on a non-employed basis.

Policy

It is prohibited for any employee, or person acting on behalf of the Group, to deliberately and / or dishonestly act, in any way, so as to commit an act of tax evasion or to facilitate tax evasion by another person. This includes facilitating tax evasion of any client or a supplier.

If an employee or person working on our behalf, suspects that a colleague or another person, whilst working in their capacity for the Group, are attempting to commit or facilitate tax evasion, this must be reported to a group FCCO immediately. The Group FCCOs may ask the person making the report to give a written statement of the events.

We will uphold laws relating to the facilitation of tax evasion and will take disciplinary action against any employee, or other relevant action against persons working on our behalf, should it be found that an act, or attempted act, of the facilitation of tax evasion has taken place. This action will result in dismissal if committed by an employee, or the cessation of our arrangement if committed by a non-employee associate.

We will also provide the relevant authorities with full details of our findings where an act, or a suspected act, of facilitation of tax evasion has taken place.

FCCOs

The Group Financial Crime Compliance Officers (“FCCOs”) are:

Chief Financial Officer

Director of Legal Services & General Counsel

Review

This policy and our procedures will be reviewed annually.

Last Review: 28 July 2025

Next Review: 28 July 2026