



Tax Evasion Policy

STATEMENT

Tax evasion, tax fraud and attempts to facilitate such actions are antithetical to the ethos of Pinson TM Limited. These crimes cheat the government out of the 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. Pinson TM Limited 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.

Pinson TM Limited 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.

ACCOUNTABILITY & GOVERNANCE

The board of our company has approved this policy and our commitment to no tolerance of tax evasion or its facilitation. The Operations Director is responsible for monitoring compliance with this policy and is supported by the Commercial Director.

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 to Pinson TM Limited 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 bring harm to Pinson TM Limited and will not be tolerated.

You are responsible for properly following Pinson TM Limited 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 this documentation and ensure they have the appropriate level of knowledge for their specific roles. All employees who have access to Pinson TM Limited banking must confirm that they do not have a criminal record. All employees must take into account tax evasion-focused communications from senior management and be aware of the latest internal information regarding the prevention of tax evasion.

HIGH RISK AREAS

- Accounts payable
- Accounts receivable
- Payment to contractors
- Payment to partners

THE KEY FACTORS WHICH MAY INCREASE RISK INCLUDE:

- Cash transactions, which are not taken or received for any service.

ACCOUNTS PAYABLE, INCLUDING PAYMENTS TO PARTNERS

- Only contract with businesses which have good reputations and are not on the UK government's sanctions list.
- Ensure all information on an invoice is correct and as expected.
- Have the full contact details of the supplier and ensure they match where the payment is being made.
- 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.
- Do not pay suppliers in cash.
- Ensure payment terms are agreed upon as part of the co-signed contract

ACCOUNTS RECEIVABLE

- Ensure correct procedures are followed.
- Do not process off-system invoices.
- Ensure all invoices have the correct VAT coding.

CONTRACTORS

- Any wage payments outside of payroll must be expressly approved by a director.
- Where tax is required to be deducted at the source, this must be done.
- Cash payments are not to be made.
- 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.
- At the time of the last review, 0 contractors are working for Pinson TM Limited.

OUR CLIENTS

Pinson TM Limited 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.
- Neither our company nor 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 Pinson TM Limited 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.

OUR COMMITMENT

Pinson TM Limited 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 every 6 calendar months.
- 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 refusing to carry out an action which may lead to a breach of this policy.

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Reviewed Date: 07/01/2026

This policy has been approved by the Directors of Pinson TM Limited and signed on its behalf.

Mr Charlie Lappin
Director

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Mr Jordan Benson
Director

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