



**For a cleaner conscience**

**Triton Showers  
Anti-tax Evasion Policy**

D.A. Tutton

A handwritten signature in blue ink, appearing to read "D.A. Tutton".

**Managing Director  
May 2022**

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# 1 Introduction and policy

Triton is committed to trading within the law and conducting all of its business activities in an honest and ethical manner. This policy governs all of our business dealings and the conduct of all persons or organisations who are appointed to act on our behalf.

Tax evasion and its facilitation are Corporate Criminal Offences (CCO) under the Criminal Finances Act 2017 (the Act), which came into effect on 30 September 2017. The Act holds organisations liable where they fail to prevent those that work for them or on their behalf from criminally facilitating tax evasion.

## TRITON SHOWERS ANTI-TAX EVASION POLICY STATEMENT

Triton has a **zero-tolerance** approach to all forms of tax evasion, whether under UK law or under the law of any foreign country.

Employees and associates of the Company must not undertake any transactions which:

- (a) cause the Company to commit a tax evasion offence; or
- (b) facilitate a tax evasion offence by a third party who is not an associate 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.

If it is proven that tax evasion or the facilitation of tax evasion has taken place, then, unless the Company can demonstrate that it has reasonable preventative procedures in place, the Company could be criminally prosecuted, face unlimited financial penalty and suffer reputational damage.

### 1.1 Who must comply with this policy?

This policy applies to all persons working for the Company, or on our behalf in any capacity. This includes employees at all levels, directors, officers, and associates, including but not limited to agency workers, seconded workers, volunteers, interns, contractors, external consultants, third-party representatives and business partners, sponsors or any other person associated with us, wherever located.

A person (which can be an individual or a company) is an “associate” of the Company if that person is an employee, agent or other person who performs services for or on behalf of the Company. Whether a person is deemed to be performing services is based on an assessment of all relevant circumstances.

### 1.2 UK and overseas

The Criminal Finances Act covers both UK and foreign tax evasion.

#### 1.2.1 UK tax evasion

Where there is a UK tax evasion facilitation offence it does not matter:

- whether the Company is UK-based or established under the law of another country; or
- whether the associated person who performs the criminal act of facilitation is in the UK or overseas.

#### 1.2.2 Overseas tax evasion

Foreign tax evasion is captured by the UK Criminal Finances Act only if the evasion is deemed to be a criminal offence had it been committed in the UK. All instances of tax evasion, whether an offence if committed in the UK or not, should be reported to the relevant point of contact (see point 3.3) for further investigation.

## **2 What is tax evasion and tax evasion facilitation?**

### **2.1 Tax evasion**

Tax evasion is the illegal or fraudulent evasion of taxes by individuals or entities. It involves deliberate and dishonest conduct. This is not the same as tax avoidance or tax planning, which is not illegal and involves taking steps, within the law, to minimise tax payable.

### **2.2 Tax evasion facilitation**

The facilitation of tax evasion means knowingly aiding or abetting an individual or entity in evading tax.

### **2.3 What taxes are covered?**

Tax means all forms of UK taxation, including but not limited to corporation tax, income tax, value added tax, all types of stamp duty, and national insurance contributions, and their equivalents in any non-UK jurisdiction.

## **3 Responsibility and Prevention**

The Triton Board has overall responsibility for ensuring that this policy complies with our legal obligations, and that our employees and associates comply with it. Employees in leadership positions are responsible for ensuring those reporting to them understand and comply with this policy and undertake any training offered in relation to it.

### **3.1 Responsibilities of all employees and associates**

All employees and associates:

- Must not engage in any form of tax evasion or facilitation of tax evasion;
- Must understand and adhere to this policy at all times; and
- Must promptly report any known or suspected tax evasion.

### **3.2 Training and Awareness**

Triton is committed to educating and maintaining the awareness of all staff of what may be captured by the legislation and to ensure that all staff are aware of our whistleblowing procedure. Examples that staff should be aware of include:

- Staff being resourced via an agency, with full knowledge of the agency's practice to pay these staff in cash and not declare their income to HMRC; or
- Intentional manipulation of documents, for example, falsifying dates on dividend documents to alter the tax year in which tax would become due; or
- Agreeing with a supplier that they can send a bill to a different person / entity than who the work was done for, or to a different address, or with a misleading description. In each case knowing that this gives the supplier a better tax position; or
- A contract being set up with a new customer as a contract for services, despite it being a provision of goods, to help the customer evade the higher tax that would be due under a contract for goods arrangement; or
- A manager signs off an employee's expense claim knowing that they are also using the same

receipts to reduce their personal tax bill.

### **3.3 Points of contact and reporting**

All Triton stakeholders must raise concerns about any issue or suspicion of tax evasion associated with the group as soon as possible. Any queries or suspicions should be made in line with the Company's Whistleblowing Policy.

Employees should first raise the concern with their line manager or tell an appropriate director who will escalate the concern in the appropriate manner.

If for any reason this is difficult or the person wishing to raise the concern is not a Triton employee, a concern can be raised in one of two ways:

- a) report the matter to the Norcros plc Company Secretary who is the nominated executive with responsibility for dealing with concerns raised under this policy and, where appropriate, ensuring that an investigation is conducted;
- b) use the Norcros plc independent confidential whistleblowing service provider, which can be found in the company's whistleblowing policy.