



Criminal Finances Act 2017 – Anti-Facilitation of Tax Evasion Policy & Procedure

BAGNALL CONSTRUCTION LTD T/AS BAGNALL ENVIRONMENTAL

Criminal Finances Act 2017 – Anti-Facilitation of Tax Evasion Policy & Procedure

Approved by: Directors, Bagnall Construction Ltd

Applies to: All employees, subcontractors, agency workers, consultants, suppliers, and any person acting on behalf of the company.

Review Cycle: Annual or when legislation changes.

1. Purpose of this Policy

The Criminal Finances Act 2017 (CFA 2017) makes it a criminal offence for companies to fail to prevent the facilitation of tax evasion.

This policy sets out Bagnall Construction Ltd's zero-tolerance approach to tax evasion, the responsibilities of all personnel, and the procedures in place to ensure compliance.

2. Scope

This policy covers:

- Direct employees
- Subcontractors and labour-only subcontractors
- Agency staff
- Suppliers and consultants
- Anyone performing services for or on behalf of Bagnall Environmental

3. Definitions

Tax Evasion: Illegal, deliberate actions to avoid paying taxes owed.

Facilitation of Tax Evasion: Knowingly helping, assisting, or enabling someone else to evade tax.

Failure to Prevent Offence: A company commits an offence if it fails to prevent an “associated person” from facilitating tax evasion.

Associated Person: Anyone performing services for the company.

4. Our Commitment

Bagnall Construction Ltd operates with zero tolerance for tax evasion or its facilitation and will take all reasonable steps to prevent such activities.

5. Responsibilities

Directors: Implement procedures and review annually.

Managers: Promote compliance and verify subcontractors.

Employees: Must comply with this policy and report concerns immediately.

6. Procedures to Prevent Facilitation of Tax Evasion

6.1 Due Diligence on Subcontractors & Suppliers

- Verify UTR, VAT status, insurance, licensing, and legitimacy before engagement.

6.2 Employment Status & Payment Controls

- Use formal contracts/Purchase Orders.

- Verify CIS status.

- Reject third-party payment requests and cash payments (except petty cash).

6.3 Training & Awareness

- Provide training for finance, procurement, and senior management.

6.4 Reporting Suspicion

Report to: Steph Walker – Company Secretary

6.5 Record Keeping

Maintain due diligence records, training logs, and financial audit trails.

6.6 Enforcement

Non-compliance may lead to disciplinary action, termination, and reporting to authorities.

7. Red Flags

Examples include: cash payment requests, inconsistent payment details, failure to provide tax information, refusal of CIS verification.

8. Monitoring & Review

The Directors will review processes and compliance annually.

9. Statement of Commitment

Bagnall Construction Ltd is committed to full compliance with the Criminal Finances Act 2017.

Signed: *Steph Walker*

Company Secretary

Bagnall Construction Ltd. 30.09.25