

# Anti-tax evasion policy

This policy sets out Bromford Flagship’s approach to addressing tax evasion in support of delivering safe, fair, and responsive services to our customers. It is underpinned by legal duties, regulatory expectations, and a commitment to fairness, accountability, and transparency.

|                                   |                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Department                        | Risk                                                                                                                                                                                                                                                                                                                                                                                               |
| Policy Owner                      | Financial Crime and Insurance Manager                                                                                                                                                                                                                                                                                                                                                              |
| Approved Date                     | November 2025                                                                                                                                                                                                                                                                                                                                                                                      |
| Date for Review                   | November 2028                                                                                                                                                                                                                                                                                                                                                                                      |
| Approving Body                    | Audit and Risk Committee                                                                                                                                                                                                                                                                                                                                                                           |
| Associated Legislation/Regulation | Bribery Act 2010<br>Criminal Finances Act 2017<br>Data Protection Act 2018<br>Economic Crime and Corporate Transparency Act 2023<br>Fraud Act 2006<br>General Data Protection Regulations<br>Human Rights Act 1998<br>Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017<br>Public Interest Disclosure Act 1998<br>Proceeds of Crime Act 2002 |
| Legal Advice From                 | None required                                                                                                                                                                                                                                                                                                                                                                                      |
| Equality Impact Assessment Date   | 22 October 2025                                                                                                                                                                                                                                                                                                                                                                                    |
| Version Number                    | 1.0                                                                                                                                                                                                                                                                                                                                                                                                |
| Publication Status                | Internal and External                                                                                                                                                                                                                                                                                                                                                                              |

## 1. Purpose / Principles

Bromford Flagship is committed to preventing tax evasion and fostering a culture of honesty, integrity, and transparency. We maintain a zero-tolerance approach to all financial crime and expect all colleagues to act with honesty and always uphold the highest ethical standards.

## 2. Scope

This policy applies to all confirmed or suspected instances of tax evasion involving Bromford Flagship colleagues, as well as any individuals or organisations with whom we maintain a business relationship, this includes associated persons working for, or on behalf of Bromford Flagship.

This policy forms part of our broader financial crime framework and reinforces our commitment to fostering a workplace culture grounded in integrity, transparency, and ethical conduct. These principles are upheld consistently and without exception across all areas of our business.

## 3. Roles / Responsibilities

Board has overall responsibility for this policy.

The Board delegate responsibility for this to the Audit & Risk Committee (ARC). ARC has responsibility for the following:

- Reviewing this policy to ensure its continued relevance and effectiveness
- Making recommendations to the Board regarding financial crime risk management and related controls
- Maintaining oversight of financial crime risk management and internal controls
- Approving the annual financial crime workplan and reviewing progress
- Approving the annual report to the Regulator of Social Housing (RSH), including the register of investigated tax evasion cases and detailing losses from fraudulent activity

Executive Disclosure Committee (EDC) and Risk and Regulation Group (RRG) are responsible for the following:

- Reviewing periodic reports, financial crime related management information, and monitoring progress against the Financial Crime Workplan, as submitted by the Financial Crime and Insurance Manager

The Financial Crime and Insurance Manager is responsible for:

- Overall responsibility for the coordination and execution of all anti-financial crime activities across Bromford Flagship
- Leading the delivery and communication of financial crime prevention, detection, deterrence, and investigation initiatives, in alignment with the financial crime framework
- Providing regular reports, financial crime related management information, and updates on progress against the financial crime framework

All colleagues are responsible for the following:

- Act in accordance with the principles outlined in this policy
- Demonstrate Bromford Flagship's values and behaviours consistently in their day-to-day activities
- Report immediately any suspicions or evidence of irregular, improper, or behaviours that indicate any form of financial crime
- Exercise propriety and accountability in the use of Bromford Flagship's resources, including the handling of funds and interactions with contractors, suppliers, and customers

## 4. Policy Content

### What is tax evasion and facilitation of tax evasion

Tax relates to all forms of UK taxation, including, but not limited to, corporation tax, income tax, value added tax, national insurance contributions and includes duty and any other form of taxation payable to His Majesty's Revenue and Customs.

Tax Evasion is 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 overseas) 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.

Improved regulation relating to tax evasion was introduced when the Criminal Finances Act 2017 (CFA 2017) came into effect from 30th September 2017. Part 3 of the CFA 2017 introduced a corporate offence of failure to prevent the facilitation of tax evasion. Bromford Flagship could be liable under the CFA 2017 where colleagues and or associated persons working for, or on behalf of Bromford Flagship deliberately and dishonestly take action to facilitate the tax evasion by the taxpayer.

### Policy commitment

This policy underpins our commitment to ethical conduct and responsible governance by:

- Safeguarding colleagues, customers, third parties, assets, and resources from misuse or misappropriation
- Promoting a culture of honesty, integrity, and accountability across all levels of Bromford Flagship
- Ensuring compliance with legal, regulatory, and contractual obligations, including reporting requirements to the Regulator of Social Housing (RSH)
- Supporting a consistent and initiative-taking approach to fraud prevention, deterrence detection, investigation and seeking redress

Bromford Flagship are fully committed to complying with the Criminal Finances Act 2017 and maintaining the highest standards of ethical conduct. To support this commitment, we:

- Prohibit all forms of tax evasion and tax evasion facilitation, whether direct or indirect, across all areas of our operations
- Implement and maintain robust procedures to prevent tax evasion, in accordance with the Act's six guiding principles: Proportionality, Top-level commitment, Risk assessment, Due diligence, Communication (including training), and Monitoring and review
- Foster a culture of integrity, transparency, and accountability, ensuring that ethical behaviour is embedded in our decision-making and business practices
- Take appropriate disciplinary and legal action against any colleague or associated person found to be involved in tax evasion or facilitation of tax evasion activities

### **Potential tax evasion identifiers**

The following is a list of potential tax evasion identifiers that may arise. The list is not intended to be exhaustive and is for illustrative purposes only.

- A third party has made or intends to make a false statement relating to tax or failed to register for VAT or failed to account for VAT
- A third-party request for payment is made to a country outside of the UK
- A third party to whom we have provided services requests that their invoice is addressed to a different entity
- A third party to whom we have provided services asks us to change the description of services rendered on an invoice in a way that seems designed to obscure the nature of the services provided

## **5. EIA statement**

An Equality Impact Assessment was undertaken for this policy on 22 October 2025.

We recognise that we may not have identified all adverse impacts on one or more protected characteristics. We welcome any feedback on, or examples of, things that we may have overlooked so that we can continuously improve our policy.

## **6. Training statement**

This policy will be trained out to relevant colleagues by e-learning and who will undertake mandatory training every two years.

## **7. Measuring Effectiveness**

The effectiveness of this policy will be measured through self-assessment and independent scrutiny by periodic internal audit reviews and oversight by Risk and Reporting Group, Executive Disclosure Committee and Audit and Risk Committee.

## **8. Review Period**

This policy will be reviewed every three years by the Financial Crime and Insurance Manager or sooner in response to significant regulatory or organisational changes. Audit and Risk Committee approve it.

**FOR INTERNAL USE ONLY –**

Supporting documents

This policy is supported by:

- Equality Impact Assessment

Version Control

| Version | Detail                       | Approved by              | Date          |
|---------|------------------------------|--------------------------|---------------|
| 1.0     | New Bromford Flagship policy | Audit and Risk Committee | November 2025 |