

Anti Facilitation of Tax Evasion Policy

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Purpose

AIS is committed to combating and eliminating tax evasion and the criminal facilitation of tax evasion and has a zero-tolerance approach in this regard. This is applicable to both tax evasion under UK law and under the law of any foreign country.

Scope

Company	Country	
Advanced Innergy Holdings Ltd	Australia	☒
Advanced Innergy Holdings Ltd	UK	☒
Advanced Innergy Group Ltd		☒
Advanced Innergy Testing Ltd		☒
AIS Covertherm Ltd		☒
CRP Subsea Ltd		☒
Advanced Innergy Solutions Ltd	UK	☒
	Bulgaria	☒
	Portugal	☒
Advanced Innergy Solutions do Brasil Ltda	Brazil	☒
AIS Bardot Ltd	France	☒
ContraFlex Kazakhstan	Kazakhstan	☒
AIS FZE	UAE	☒
AIS Korea Ltd	Korea	☒
AIS US Inc	USA	☒
AIS Integral Ltd	Canada	☒
AIS Malaysia SDN BHD	Malaysia	☒
Advanced Innergy Solutions Angola Ltda	Angola	☒
Clients, Customers, Consultants, Contractors, and Suppliers	All	☒

Responsibility

It is the responsibility of all employees, clients, customers, consultants, contractors, and suppliers to adhere to this policy.

Policy

The Criminal Finance Act 2017 makes relevant bodies criminally liable where they fail to prevent those who act for, or on their behalf, from criminally facilitating tax evasion. It achieves this by attributing criminal liability to relevant bodies for the criminal acts of employees, agents or third parties who provide services for or on their behalf. This offence can arise even when the relevant body was not involved in or was unaware of the facilitation. A relevant body will not be liable where it has put in place “reasonable prevention procedures” to prevent its associated persons facilitating tax evasion.

AIS is committed to combating and eliminating tax evasions and the criminal facilitation of tax evasion and has a zero-tolerance approach in this regard. This is applicable to both tax evasion under UK law and under the law of any foreign country.

1.1 Definition of facilitation of tax evasion

Tax evasion is the offence of cheating the public revenue or fraudulently evading UK tax (it must include an element of fraud which means there must be a deliberate action, or omission with dishonest intent).

Foreign tax evasion is similar and means evading tax in a foreign country, provided that the conduct is an offence in that country and would be an offence if committed within the UK. Again, there must be an element of fraud committed.

UK tax evasion facilitation offence means an offence under the law of any part of the United Kingdom consisting of:

- being knowingly concerned in, or in taking steps with a view to, the fraudulent evasion of a tax by another person,
- aiding, abetting, counselling, or procuring the commission of a UK tax evasion offence,
- being involved in the commission of an offence consisting of being knowingly concerned in, or in taking steps with a view to, the fraudulent evasion of a tax.

Tax evasion is not the same as tax avoidance or tax planning. Tax evasion involves deliberate and dishonest conduct. Tax avoidance is not illegal and involves taking steps, within the law, to minimise tax payable (or to maximise tax reliefs).

1.2 Purpose of the policy and who it is applicable to

This policy sets out our responsibilities and the responsibilities of those working for us, in our position on preventing criminal facilitation of tax evasion. We will provide guidance and training to those working for us on how to recognise and avoid tax evasion.

We have identified that the following are particular risks for the business:

- Country risk - some countries in which we operate within as a business are recognised to present an enhanced risk of corruption;
- Business partnership risk - the business has a number of joint venture and agent relationships in which we are committed to ensuring they comply with our tax evasion policy;
- Customer/supplier risk

To address these risks, the management team will implement additional mitigation procedures which will be subject to continuous review and change.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, agents, contractors, external consultants, third-party representatives and business partners, or any other person associated with us, wherever located.

1.3 Principles

Under this policy, you must not:

- Engage in any form of facilitating UK or foreign tax evasion
- Aid or abet another person in facilitating UK or foreign tax evasion
- Fail to report promptly any demand or request from any party to facilitate the evasion of tax (or if you suspect any party of doing the same)
- Engage in any other activity which may lead to a breach of this policy
- Threaten any individual who has refused to commit a tax evasion offence or who has raised concerns through this policy

1.4 Responsibilities

You must ensure you have read and are familiar with this policy and comply with all its contents.

You must notify your line manager, Head of Finance or Chief Financial Officer as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.

If you are unsure whether a particular act constitutes tax evasion please raise it with your line manager, Head of Finance or Chief Financial Officer as soon as practicable.

Individuals who raise concerns or report another person's wrongdoing are protected under the Group's whistleblowing policy.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and businesses working on our behalf if they breach this policy.

Log of changes

Iss.	Section	Description of change
01	All	Initial Issue
02	Title page	Change of company address