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**PHOENIX RDS**  
**CORPORATE GOVERNANCE & COMPLIANCE POLICIES**



Phoenix-RDS

Policy Summary Sheet

Policy Number	PRDS-MS-POL-004
Policy name	Anti-Facilitation of Tax Evasion (AFTE) Policy
Revision	1.0
Date	01/01/22

**This Policy sets out the principles and commitments that support Phoenix RDS's intention to conduct business in an honest way, and to seek to prevent, where practicable, the use of corrupt practices including tax evasion. Tax evasion is the use of illegal means to attempt to minimise tax liability through fraudulent techniques to circumvent or frustrate tax laws.**

**Managers, staff and contractors are expected to comply with this Policy and identify shortcomings, omissions or compliance failures to their line manager.**

**Phoenix RDS's intent is that the company and its staff will operate in compliance with six AFTE principles. We will:**

- Adopt reasonable, risk-based procedures to prevent criminal facilitation of tax evasion.
- Promote our principles on AFTE via visible engagement and participation of senior management and maintain a culture where it is recognised that activity intended to facilitate tax evasion is never acceptable.
- Apply due diligence procedures, taking an appropriate and risk-based approach, in respect of persons who perform, or will perform, services on behalf of the organisation, in order to mitigate identified risks.
- Ensure that prevention policies and procedures are communicated, embedded and understood throughout the organisation.
- Monitor and review preventative procedures and make improvements where necessary.
- Assess the nature and extent of exposure to the risk of an individual associated with Phoenix RDS facilitating tax evasion offences. The risk assessment is documented and kept under review.

**As a UK-based company we are committed to:**

- Operating in accordance with:
  - ✓ [UK Government AFTE Guidance](#)
  - ✓ [FCA Guide to Preventing Financial Crime](#)
  - ✓ [Criminal Finances Act 2017](#)
  - ✓ [UK Government Bribery Act Guidance](#)
- Demonstrating we take our AFTE responsibilities seriously and will not tolerate tax evasion practices in any form, wherever they may occur, and will seek to prevent such occurrence if we can reasonably do so.
- Ensuring compliance with applicable tax laws in those countries where the company conducts business.
- Following the intention of the law in a responsible manner where tax law, regulations and practices are unclear or ambiguous.
- Ensuring there is clear responsibility for overseeing the operation of this policy. Responsibility rests with the Managing Director.
- Establishing financial controls which help minimise the risk of acts of tax evasion occurring whether within Phoenix RDS or by individuals or other organisations we interact with (e.g. employees, clients, business partners, subcontractors or suppliers).
- Making appropriate resources available to implement this policy.
- Ensuring the policy and related procedures are easily accessible to, and understood by all managers, staff and contractors.
- Supporting the policy with adequate training, mentoring, advice and support systems.

- Communicating our principles and commitments on AFTE to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforcing this, as appropriate, thereafter.
- Including an evaluation and validation of the organisation and arrangements contractors and suppliers have in place to manage AFTE, when pre-qualifying and approving them to work with Phoenix RDS, where risk assessment indicates this is appropriate.

**This includes:**

- ✓ Employment and recruitment agencies and other third parties supplying workers to our organisation.
- ✓ Suppliers engaging workers through a third party.
- Working with suppliers, vendors and business partners who have comparable and compatible values and standards for:
 

✓ AFTE	✓ Regulatory compliance
✓ Sustainability	✓ SHEQ
✓ Business ethics	✓ Human rights and labour rights
✓ Rejection of corruption and bribery	✓ Eliminating slavery and human trafficking in the supply chain
✓ Supply chain management	
✓ Protection of intellectual property and company assets	
- Identifying and reviewing the AFTE risks associated with our operations and our relationships with suppliers and business partners at regular intervals (at least annually) and at the commencement of major projects.
- Terminating relationships with suppliers and business partners that do not meet the requirements outlined in this policy and/or international or national legislation, regulations and guidance, and that are unwilling to change the undesired practices within an agreed timeframe.
- Recognising and understanding customer expectations on AFTE issues and ensuring all legislative and regulatory tax disclosure and transparency requirements are complied with.
- Communicating openly about our achievements and challenges in relation to AFTE and cooperate with regulators and relevant non-governmental organisations (NGOs).
- Encouraging employees, and other stakeholders, to comment on this policy, the effectiveness of its application and any concerns or suspicions that our principles and commitments on AFTE are not being met at the earliest possible stage.
- Taking seriously any allegations that the company's principles and commitments on AFTE are not properly respected, and ensuring such allegations are fully investigated, by a competent, independent resource and appropriate remedial action is taken promptly.
- Protecting whistle-blowers, acting in good faith, on infringements of our AFTE principles and commitments and processes in accordance with PRDS-MS-POL-004.

- Protecting employees who, acting in good faith, refuse to carry out an act which they believe infringes the companies principles, commitments and overall approach to managing AFTE.
- Ensure that lessons learned reviews take identified issues associated with the company's principles, commitments and overall approach to managing AFTE into account.
- Including AFTE principles and standards in audit scopes where risk assessment confirms this is an appropriate strategy. Providing clear audit trails to meet the requirements of internal and external audits.
- Maintaining intelligence on the upstream industry supply and services market to establish and monitor any emerging trends and risks in managing AFTE in the supply chain that might necessitate alternative commercial options and contracting strategies.
- This policy shall be implemented having regard for other relevant Phoenix RDS policies (SHEQ, Anti-Bribery & Corruption, Sustainability, Disclosure/Whistleblowing, Anti-Slavery & Human Trafficking, Supply Chain, Human Rights etc).



Rory Somerset  
Managing Director  
1<sup>st</sup> January 2022