



Criminal Finances Act 2017

As a Firm, we value our reputation for ethical behaviour and for financial probity and reliability.

We recognise that over and above the commission of any crime, any involvement in the facilitation of tax evasion will also reflect adversely on our image and reputation. We do not tolerate tax evasion, or the facilitation thereof in any circumstances, whether committed by or facilitated by a client, by our own partners and employees or associated persons/companies.

We are committed to fighting tax evasion and have rigorous policies and procedures in place to detect and prevent the facilitation of tax evasion offences. We provide regular training on the requirements of the Criminal Finances Act 2017 to all our partners and employees. We require all partners and employees to demonstrate the highest standards of honesty at all times and appropriate disciplinary action will be taken wherever tax evasion or the facilitation thereof by any partner or employee has been proven.

We undertake due diligence on all associated persons/companies to mitigate the risk of facilitation of tax evasion offences and, as part of our due diligence procedures, all agreements with third parties contain suitable provisions to enable termination of such agreements where associated persons/companies are not complying with the provisions of the Criminal Finances Act 2017.

Vivian Vernick
COLP