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COMPANY POLICY

Anti-Tax Evasion Policy

Document ref: **IC-POL-06**
Issue date: **1 July 2026**
Review cycle: **Annual**

1. Policy statement

Ignis Circular Ltd has zero tolerance of tax evasion and of the facilitation of tax evasion in any form. In line with the Criminal Finances Act 2017, we are committed to preventing any person associated with the company — employees, agents, contractors or other service providers — from criminally facilitating the evasion of UK or foreign tax.

2. Reasonable prevention procedures

- All customer and supplier payments are made and received through traceable banking channels; cash transactions are exceptional, capped and always documented through the weighbridge and accounting systems.
- Landfill Tax, VAT and other duties are accounted for accurately, on time, and with professional advice where treatment is uncertain.
- Due diligence is carried out on new suppliers, brokers and haulage partners, with particular care where a request seems structured to disguise the true nature, value or destination of a transaction.
- Invoices must accurately describe the goods and services supplied; no employee may issue, request or accept documentation they know to be false.

3. Raising concerns

Any employee who suspects tax evasion, or who is asked to take part in anything that could facilitate it, must refuse and report the matter to the Director immediately. Concerns can be raised in confidence and no one will suffer any detriment for raising a genuine concern, even if it proves unfounded.

4. Breaches and review

Breach of this policy by an employee is gross misconduct and may lead to dismissal; breach by a supplier or partner will lead to termination of the relationship and, where appropriate, referral to HMRC or law enforcement. The Director reviews this policy and our prevention procedures annually.

Stephen Iddon

Stephen Iddon
Director, Ignis Circular Ltd

Signed: **1 July 2026**
Reviewed: **Annually**