

Smartwatch Solutions provides Static Guard, Mobile Patrol, Alarm Response and Keyholding, Virtual Guard CCTV and Access Systems & Services to a wide range of organisations.

This policy summarises the procedures of Smartwatch Solutions to ensure all associated persons, including employees and those acting on our behalf, do not facilitate tax evasion.

Smartwatch Solutions is committed to zero tolerance for tax evasion, and we are committed to a dedicated programme to counter the risk of any employee, contractor, business partner or representative of our company engaging in the criminal facilitation of tax evasion.

We expect everyone who works with our company to fully comply with their tax obligations. We will not tolerate, permit or allow any person associated with us to engage in the facilitation of tax evasion or tax fraud by any of our customers, suppliers, business partners, contractors or employees.

Smartwatch is committed to complying in full with the tax laws. We aim to pay the right amount of tax at the right time for all corporation tax, VAT, PAYE and any other taxes we may be liable to pay.

Employee responsibilities

Our code of conduct sets the standards of behaviour we expect all employees to adhere to. Our employees have a responsibility to take reasonable action to prevent harm to Smartwatch Solutions and we hold our employees accountable for their actions and omissions. Any actions that breach any tax law brings harm to Smartwatch Solutions and will not be tolerated.

You are responsible for properly following our policies and procedures. These should generally ensure that all taxes are properly paid. If you are ever asked by anyone either inside or outside our company to go outside our standard procedures, this should be reported without delay, as someone may be attempting to evade tax.

Any employee who has any concerns relating to any potential breach of this policy must immediately report the matter without delay to a director of the business.

Our risk assessment

Our risk assessment shows we are low risk because of the way we undertake our business, but the following is worth being aware of

High risk areas for our business include:

1. Accounts payable
2. Accounts receivable
3. Payment to contractors

The key factors which may increase risk include:

- Cash transactions

Accounts Payable

1. Only contract with suppliers who undergo our approved supplier process.
2. Ensure all information on an invoice is correct and as expected.
3. Have the full contact details of the supplier and ensure it matches to where the payment is being made.
4. Ensure that a supplier's VAT registration number is valid and matches the name of the supplier on the government website.
5. Do not pay suppliers in cash. If cash payments must be made, ensure they are properly invoiced and a receipt is supplied.

Accounts Receivable

1. Ensure correct procedures are followed.
2. Do not process off-system invoices.
3. Ensure all invoices have the correct VAT coding.

Contractors

1. Any wage payments outside of payroll must be expressly approved.
2. Where tax is required to be deducted at the source this must be done.
3. Payments to contractors should only be made in strict accordance with company policies.
4. Cash payments should not be made. If they are, invoices and receipts must be present.
5. Any tax related withholdings must be deducted and recorded.
6. Payments without deductions should only be made if there is a reasonable expectation that the recipient will meet their tax obligations.

Our commitment

Smartwatch Solutions is committed to the following principles:

- Our business is carried out fairly, honestly, and openly in every part of our work.
- We will never sell any product or service where we know or suspect that any aspect of the transaction is being misused, abused or otherwise corrupted for the purposes of tax evasion.
- We will never buy any product or service from any supplier where it is known or suspected that any aspect of the transaction is being misused, abused or otherwise corrupted for the purposes of tax evasion.
- We will immediately terminate any agreement or business relationship as soon as our company learns of, or suspects tax evasion may be taking place.
- We will not progress any business opportunity where there is any suspicion that any aspect of it may involve tax evasion.

- We will not do business with others who do not also hold to at least the same standard of preventing tax evasion.
- Our company will regularly monitor and review this policy.
- Any employee found in breach of this policy will be subject to disciplinary action.
- We will not tolerate any contractor, business partner, representative or other third party associated with us failing to uphold this policy.
- No employee will suffer demotion, penalty, or any other adverse action for reporting any breach of this policy or from refusing to carry out an action which may lead to a breach of this policy.

How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of tax evasion or foreign tax evasion at the earliest possible stage.

If you become aware of any fraudulent evasion of tax by another person in the course of your work, or you are asked to assist another person in their fraudulent evasion of tax (whether directly or indirectly), or if you believe or suspect that any fraudulent evasion of tax in a foreign country, you must report it to the Managing Director or report it in accordance with our Whistleblowing Policy as soon as possible.

Protection

Individuals who raise concerns or report another's wrongdoing are sometimes worried about facing possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of:

- a) Refusing to take part in, be concerned in or facilitate tax evasion by another person;
- b) Refusing to aid, abet, counsel or procedure the commission of a tax evasion offence by another person; or
- c) Reporting in good faith their suspicion that an actual or potential tax evasion offence has taken place, or may take place in the future.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any of this treatment, you should inform the Managing Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Signed:

Position: Managing Director



Name: Neil Jones

Date: 30/07/2025