

Criminal Finances Act 2017 – Sovini Group Compliance Statement

This statement applies to all entities within the Sovini Group which includes the following companies:

- Sovini Limited (Parent Company)
- One Vision Housing Limited
- Pine Court Housing Association
- Sovini Developments Limited
- Sovini Charities Limited
- Pride of Sefton
- Sovini Commercial Limited
- Sovini Property Services Limited
- Sovini Trade Supplies Limited
- Sovini Construction Limited
- Sovini Land Acquisition Limited
- Sovini Waste Solutions Limited
- Amianto Services Limited
- Teal Scaffold Limited, and
- Sovini Homes Limited.

All entities within The Sovini Group are committed to promoting the highest standards of probity in the business practices we carry out directly and those that can be associated with us through our procurement arrangements and supply chains.

To this effect, we have built on the sound practices that we already have in operation to detect and prevent any form of fraud, corruption, and money laundering and to put reasonable procedures in place to prevent the criminal facilitation of tax evasion and failure to prevent fraud.

Our commitments in this area show how we comply with the requirements of the Criminal Finances Act 2017 / The Economic Crime and Corporate Transparency Act 2023 and are endorsed at the highest level by the Sovini Parent Board and the Boards of the individual entities within our Group structure.

Listed below are the reasonable procedures we have adopted to assess the highest areas of risk for tax evasion offences, the due diligence we will undertake with those we choose to buy goods and services from, the clear messages for zero tolerance of this type of activity and our ongoing watchfulness in the form of monitoring and review.

Risk Assessments

The Sovini Group carry out regular risk assessments to assess those business activities which, present the greatest risks for tax evasion and / or fraud by all persons associated with the Sovini Group, both individuals and bodies corporate.

This risk assessment ensures that:

- These risks are given specific definition, are ranked in terms of potential impact / likelihood and are prioritised for risk mitigation where possible
- Identified risks are assigned to 'risk owners' who have key responsibility for:
 - The effective operation of internal control measures;
 - Escalation of any issues that indicate risks are not being adequately controlled and raising of alerts where concerns exist;
 - Risk monitoring on an on-going basis, providing information for assurance reporting in conjunction with Internal and External Audit and the Risk and Audit Committee (RAC), to the relevant Boards and Executive Management Team (EMT).

The risk assessment would also be refreshed in response to any identified cases of tax evasion / fraud, should they occur.

Due Diligence

To ensure that we continue to protect against tax evasion or fraud opportunities that may arise from new companies who join The Sovini Group, new business ventures, partnerships we develop and contracts that we enter into, we carry out comprehensive due diligence checks.

The level of checks applied are proportionate to the size of the transactions proposed and the level of risk it presents. Each due diligence exercise is tailored to the specific circumstances concerned and may involve external legal advice, as required. The results of due diligence checks will in turn feed into a revised risk assessment process.

Contractual Terms and Conditions

To ensure those who we choose to purchase goods and services from uphold our standards and good practice, we continue to review and where appropriate amend the terms and conditions of our contracts and have improved procedures by moving the application and verification process on-line via a dedicated portal.

To be accepted as an approved supplier, businesses need to demonstrate that they have effective procedures in place to detect and prevent potential tax evasion offences. Our Procurement Team carry out supplier audits to test the effectiveness of these arrangements, during the lifespan of the contract term.

We will terminate the contracts of any organisation found to be responsible for Corporate Criminal Offences under the Criminal Finances Act 2017 or The Economic Crime and Corporate Transparency Act 2023, which is associated with the business they conduct with The Sovini Group.

We will also make appropriate alerts to His Majesty's Revenue and Customs (HMRC) where we believe active facilitation of tax offences is occurring or there is potential for it to occur.

Zero Tolerance Approach

Our stance outlined above for those within our supply chain will apply equally to our own employees. If, after thorough internal investigation or because of any individual prosecutions, our employees are

found to be responsible for criminal tax evasion / facilitation or fraud they will be subject to disciplinary procedures and may be dismissed.

Reporting and Investigation

Similar to the effective arrangements we have in place for the reporting, investigation and control of fraud, corruption and money laundering, we continue to monitor and report any tax concerns and seek advice and support from our independent Tax advisors.

Key Officers are trained in aspects of compliance with the Criminal Finances Act, including appropriate investigations, implementation of control measures and external reporting, where required.

Throughout The Sovini Group we also deploy effective confidential reporting (whistleblowing) policies and procedures. These policies identify the means of contact of our trained Officers and are widely available to our staff and those involved in our governance structures.

We continue to support and protect individuals that raise concerns but do not wish to be identified and will investigate as appropriate tax evasion activity or fraud, if made anonymously.

When required to share information with the HMRC or any other official investigation agency where suspected criminal activity has taken place, the exemptions that are outlined in UK data protection legislation (Data Protection Act and General Data Protection Regulations) will apply to any personal data which may be shared.

This will also apply to client information in line with the SAR's reporting responsibilities of the Proceeds of Crime Act.

IR35 Implementation

In compliance with IR35 rules (off-payroll working rules), our Procurement and People and Learning Teams have carried out the appropriate 'Check Employment Status for Tax – CEST' checks on all existing suppliers across The Sovini Group.

Managers across the Group who may be responsible for procuring goods and services receive regular IR35 training and any new goods and services procured are subject to appropriate levels of CEST testing, before being approved.

Monitoring and Review

To ensure that our response to the risks of corporate criminal offences remain effective and is appropriately resourced, all designated risk owners throughout The Sovini Group are required to continually monitor the areas they are responsible for and raise concerns if any potential failings are identified.

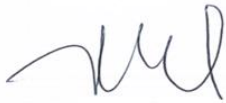
As our business grows and expands, we will also ensure any emerging risks are identified, assigned and appropriate control measures are put in place.

To raise awareness of the requirements for constant vigilance around tax evasion facilitation offences or fraud and to ensure appropriate responses are made where any concerns exist, we will provide training for all our employees and boards, which will be periodically refreshed.

Our response and procedures for complying with the requirements of the Criminal Finances Act will be periodically tested by our Internal Auditors using a risk-based approach. Our External Auditors will also assess our response to all forms of fraud as part of their objectives when reviewing key financial controls within our approved and published financial statements.

Signed:

Reviewed: 16th April 2024

A handwritten signature in black ink, appearing to read 'RW', is positioned below the 'Signed:' label.

Roy Williams

Group Chief Executive Officer