

Policy Objective

Blue Marine are aware of the laws in place relating to tax evasion and take our responsibilities seriously. We take a zero-tolerance approach to tax evasion and the criminal facilitation of tax evasion in any country. Integrity and transparency are of utmost importance, and we conduct our working practices to the highest legal and ethical standards.

Blue Marine are committed to taking all reasonable steps to prevent associated persons from facilitating tax evasion and will investigate and act on concerns.

This policy supports our wider controls and culture—please also refer to our Anti-Bribery and Corruption policy, Anti-Fraud Policy and Whistleblowing Policy.

Scope

- 1.1 This policy applies to all trustees, employees, volunteers, interns, consultants, contractors, suppliers, delivery partners, agents, intermediaries and any other associated person performing services for or on behalf of Blue Marine or BMF Trading Limited.

Tax Evasion

- 2.1 Tax evasion is the practice of using illegal methods to avoid paying tax. It involves deliberate and dishonest conduct and is not the same as tax avoidance. It frequently involves contrived, artificial transactions that serve no purpose other than to reduce tax liability.
- 2.2 The following list contains indicators of tax evasion:
 - requests for cash payment
 - overly complex payment mechanisms
 - transactions involving overly complex supply chains
 - transactions involving private banking facilities
 - incomplete or non-standard invoices or other records relating to the payment of tax
 - making false statements in relation to the payment of tax or failure to register with relevant bodies tasked with ensuring tax compliance
 - failure to register for VAT
 - any individual or supplier asking to be paid gross when they should be paid net.

The Law

- 3.1 Under the Criminal Finances Act 2017, organisations commit a corporate criminal offence if they fail to prevent their associated persons from criminally facilitating tax evasion, whether UK or foreign tax evasion. The defence is to have “reasonable prevention procedures” in place. This policy embodies those procedures.

Definitions

- 4.1 **Tax evasion:** Deliberately doing something illegal to not pay the tax that is lawfully due (by an individual or an organisation).
- 4.2 **Facilitation of tax evasion:** Helping someone else to evade tax (e.g., falsifying invoices, concealing beneficial ownership, channelling payments to enable evasion).
- 4.3 **Associated person:** Anyone who performs services for us (see Scope).

Roles and Responsibilities

- 5.1 It is strictly prohibited for any employee or individual working on our behalf, or in connection with us to take part in any activity, directly or indirectly, relating to tax evasion or the facilitation of tax evasion.
- 5.2 You must not:
 - undertake any action which facilitates tax evasion, or
 - aid or abet any action of tax evasion.

You are required to report any behaviour which reasonably leads you to believe that tax evasion or the facilitation of tax evasion is occurring in any way which is connected to the Organisation.

- 5.3 Where we have reason to believe that you have breached any obligation under this policy, action will be taken which is appropriate to our relationship with you. This includes the instigation of a disciplinary procedure, or the termination of our contractual arrangement with you.
- 5.4 Blue Marine's framework of roles to support this policy include:
 - **Board of Trustees:** Sets tone from the top; approves the policy.
 - **CEO / Head of Operations (Policy Owner):** Ensures risk assessment, controls, training and investigations are in place and effective.
 - **Director or Finance, Operations and Governance and the wider Finance Team:** Payment controls, supplier onboarding, accounting accuracy, audit trail.
 - **People and Culture:** Training, induction, whistleblowing awareness, disciplinary process.
 - **Project Leads:** Apply due diligence and contract clauses; monitor delivery partners.
 - **All staff and third parties:** Read, understand and follow this policy; report concerns immediately.

Blue Marine's 'Reasonable Prevention Procedures'

- 6.1 Blue Marine applies proportionate controls based on risk. In practice this means we enforce this policy through the following considerations:

6.1.1. Risk Assessments

These are conducted regularly as standard practice and annually at a minimum. Risk assessments allow us to identify and review higher risk scenarios. Examples of this may include, but are not limited to, international projects and partners, off payroll engagements, consultancy and success fees, complex payment requests, use of offshore structures, third-party payments, grants/donations or onward- funding and procurement in higher risk jurisdictions.

6.1.2. Due diligence (before engagement and periodically)

This measure ensures we are vigilant in verifying counterparties (identity, beneficial ownership, tax status, red flags). Standard procedure for Blue Marine requires written assurances against tax evasion facilitation by ensuring you follow the above processes and are aligned with our policies.

Blue Marine will not recommend the services of others who do not have reasonable prevention procedures in place.

6.1.3 Contracts and onboarding

All contracts at Blue Marine include Anti facilitation of tax evasion clauses and include an obligation for any subcontractors to ensure compliance to the same standard or higher than Blue Marine. This requirement is also extended to Partner and sponsor templates, and Blue Marine retains the right to audit these contracts and terminate any party in breach of these conditions.

6.1.4 Payments and records

No cash payments unless essential and preapproved; no undisclosed third-party payments; no split invoicing to avoid taxes.

In line with Blue Marine's Finance Procedures and audit expectations (in grant agreements) you are obligated to keep accurate, complete records and supporting documentation of any payments.

6.1.5 Training and communication

Blue Marine will provide proportionate, role specific training to all staff. This is provided as part of our on-boarding process during induction and is re-enforced periodically with refresher training materials. Communication around this topic is also available on our Policy Hub and intranet.

6.1.6 Monitoring, assurance and review

Spot checks on expenses, consultancy payments and partner disbursements.
Escalation of anomalies for investigation; annual policy review via the Policy Owner and Board.

7. Practical red flags (speak up if you see these)

- Requests to pay in cash, to personal accounts, or to a third party without clear justification.
- Requests to re-invoice with altered descriptions/amounts to change tax treatment.
- Unusual offshore or “special purpose” routes for routine payments.
- Suppliers/partners unwilling to confirm tax compliance or beneficial ownership.
- Pressure to expedite payment before KYC/due diligence is complete.
- Expense claims that circumvent tax rules (e.g., disguised remuneration).
- Reporting concerns (no retaliation).

7.1 If you suspect tax evasion or facilitation, stop the transaction where safe to do so and report immediately to your line manager and the **Head of Operations**. You can also use Blue Marine’s Whistleblowing Policy channels; we protect good faith- reporters from retaliation and handle concerns confidentially.

7.2 Blue Marine may be legally obliged to report certain matters to authorities and will cooperate with lawful investigations.

Breaches and Consequences

8.1. Breaches will be investigated. Proven misconduct may result in disciplinary action (up to dismissal), contract termination, recovery of losses, and reporting to law enforcement or regulators. This applies to employees and all associated persons.

8.2. Quick reminders

Do

- Run due diligence and use approved contract wording.
- Keep full, accurate records and follow payment controls.
- Raise concerns early—use whistleblowing if needed.

Don’t

- Agree to arrangements designed to conceal or misrepresent payments or tax status.
- Process payments to unknown or unjustified third parties.
- Ignore red flags or pressure to “make it work”.

Reporting concerns

9.1. You must notify the **Head of Operations** at the earliest stage if you suspect that tax evasion or the facilitation of tax evasion may be occurring. The failure to report a suspicion, of itself, may constitute an offence of facilitation of tax evasion. Therefore, we strongly encourage the reporting of concerns.

9.2. Once reported, an investigation will be carried out. As part of the investigation, you may need to give an account of your suspicions including names, dates and any other pertinent information.

- 9.3. You may also report any concerns through Blue Marine’s whistleblowing policy which is available on Blue Marine’s Policy Hub on the intranet.

Detriment

- 10.1 No individual who reports a concern relating to tax evasion or facilitation of tax evasion under this policy, or our whistleblowing policy, will be subjected to detrimental treatment as a result of their actions.
- 10.2 Additionally, no individual will be subjected to detrimental treatment because they have refused to take part in any behaviour which is prohibited by the policy.

Training and Review

- 11.1 Blue Marine will ensure that all relevant individuals are provided with appropriate training in relation to financial crime detection and prevention.
- 11.2 We will ensure we monitor and enforce compliance with the prevention procedures and will regularly review the effectiveness of the prevention procedures in place.
- 11.3 Blue Marine reserves the right to amend this policy without prior notice.