

CCO Compliance Statement

Introduction

This statement is published in accordance with the Criminal Finances Act 2017 (the "Act") and is a summary of our Corporate Criminal Offences ("CCO") Policy that has been approved by the Board of Directors. This statement sets out the commitment of Esken Limited ("Esken") and its subsidiaries ("We", "Esken") to preventing Associated Persons (including employees as defined by the Act), from engaging in the criminal facilitation of tax evasion in the UK or in a foreign country.

Overarching approach

Esken does not condone any form of tax evasion, whether in the UK or overseas. At all times, business is to be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented. Furthermore, all employees and other Associated Persons must not undertake any transactions which; causes Esken and/or its subsidiaries to commit a tax evasion offence; or facilitate tax evasion offence by a third party, who is not an Associated Person of the Company or one of its subsidiaries.

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. We will implement and enforce effective policies and procedures to counter the facilitation of tax evading activities.

Risk assessment

We have a Risk Management Framework in place which provides the structure for the Group's approach towards identifying and mitigating CCO-related risks. We undertake internal auditing of business processes with due consideration of all our compliance obligations, including those relating to the Criminal Finance Act 2017, to ensure that the policies and procedures in force are effective in mitigating tax evasions and any facilitation activities.

Training and awareness

To support our staff in their understanding of tax evasion and identifying when and how it might occur, as a minimum, relevant employees are required to complete CCO training initially when they start working for any of Esken companies and annually each year after that. Further tailored training is provided depending on an employee's position within the Group and the day-to-day job role they perform.

Declaration

Esken is committed to acting professionally, fairly and with integrity in all business dealings and relationships. We will implement and enforce effective policies and procedures to counter the facilitation of any tax evading activities.

Esken Board of Directors