



CODE OF CONDUCT POLICY - APRIL 2019

Message from our Chief Executive Officer

Xstrahl is dedicated to inventing technologies to help save and protect lives and we place top priority on ethical business practices. For over 20, we have developed advanced medical devices that are used by healthcare professionals globally. Our pioneering work helps patients with non-melanoma skin cancer and benign conditions around the world. Xstrahl has a strong reputation for integrity and ethical conduct and our name and products are trusted by our partners, customers and patients. The responsibility for making sure that our customers trust us lies with every one of us, every day.

Acting with integrity is more than just compliance with the law. Xstrahl's Code of Conduct, which has been adopted by our board of directors, gives our basic legal and ethical principles for carrying out business, and applies both to employees and to others who act for us. Those who deal with us should also expect that we will meet accepted ethical standards. We should always behave ethically, even in situations where the law is unclear or is still developing. Nothing – not making the numbers, competitiveness or direct orders from a supervisor – should ever compromise our commitment to integrity. We all count on each other to uphold these standards to make sure that we keep our reputation for integrity.

Xstrahl's Values are being dynamic and adaptive, being customer focused, being productive and getting the detail right. Thank you for living our values and playing your part in this shared commitment.

Sincerely,

Adrian Treverton



Introduction

At Xstrahl, we are committed to the principles of integrity, honesty and professionalism. We have a culture of openness, responsibility and compliance throughout our business operations. We will never use improper methods to influence medical practitioners and institutions to use our products. Our management is determined to make sure that we are best in class in terms of compliance in all markets in which we do business.

This Code applies everywhere we do business. All our employees must understand and follow all relevant laws, this Code and any relevant procedures. Any third-party representatives who carry out business on our behalf, directly or indirectly, must understand and follow all relevant laws, this Code and the relevant procedures when carrying out that business. In some regions, local laws, regulations or business requirements may be stricter than the policies set out in this Code. In those cases, we expect you to follow the local law, regulation or business requirement as described in the procedures.

This Code does not replace your responsibility for making good judgements and using common sense. This Code also does not describe all laws or company policies which apply or give full details on any individual law. Punishments for misconduct can be severe, including financial penalties, criminal convictions and our products not being eligible for government reimbursement or other programmes. Under many of these laws, anyone who is involved in an illegal activity can be held responsible. This means that you, customers and third parties can be prosecuted as well as our Company. We could also take disciplinary action against you including ending your employment.

If you have additional queries after reading this Code of Conduct, please contact: Adrian Treverton.

Purpose, Vision and Mission

Xstrahl's **purpose** is to help eradicate cancer and our **vision** is to be innovators in the application of X-ray technology. As a **mission**, we listen to our customers, create innovative solutions and deliver the best customer service. We accomplish this by incorporating our company values – customer-centric, production, dynamic/adaptive and get the detail right - into all aspects of our daily business life.

We are responsive to customer needs. We set clear goals and standards – and achieve them. We deliver quality and value. We strive for continuous improvement. As a result, our customers, colleagues and shareholders have confidence in our products and in us.

We are energetic, creative, passionate – always seeking to improve. We are forward looking, anticipating customers' needs, overcoming barriers and developing opportunities. We learn from our successes and failures. We encourage and support new ideas.

We earn trust by being personable - by building close relationships with our customers, colleagues and communities; by listening to, understanding and respecting people's needs; and by being straightforward and doing what we say. We have integrity, and an ethical, honest approach to business.

Stakeholders

We respect the rights of all our stakeholders and seek to build open, honest and constructive relationships. We take account of ethical, social, environmental, legal and financial considerations in our planning and business decisions.

Employees

We aim to provide an open, challenging, productive and participative environment based on constructive relationships. We maintain good communications with employees through regular and timely company information and consultation. We provide clearly communicated goals and performance standards, and the training, information and authority needed to do a good job. We provide fair recognition and reward based on performance. We are committed to working with employees to develop each individual's talents, skills and abilities. We provide encouragement to learn and progress and to participate fully in the quest for continuous improvement. We recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed. We do not tolerate discrimination on any grounds and provide equal opportunity based on merit. We are committed to building diversity in a working environment where there is mutual trust and respect and where everyone feels responsible for the performance and reputation of our Company. We are committed to providing healthy and safe working conditions for all

employees. We achieve this by ensuring that health and safety and the working environment are managed as an integral part of the business, and we recognise employee involvement as a key part of that process.

Third Party Representatives and other service providers

In many regions, we rely on Third-Party Representatives to do business on our behalf. They play a vital role for us and in doing so must comply with applicable laws, industry codes and this Code. We also rely on other service providers, such as suppliers, advisers and consultants. We take all reasonable steps to select service providers that are committed to compliance with the law and ethical behaviour. We select Third Party. We select Third Party Representatives based on their qualifications, reliability and adherence to applicable laws. We take reasonable care in selecting them and do appropriate reviews from time to time. We never authorise or allow a Third-Party Representative or other service provider to act improperly on our behalf.

Customers

We are committed to developing and delivering innovative, cost-effective solutions that provide real benefits to healthcare professionals and their patients through improved treatments, ease and speed of product use, and reduced healthcare costs. To underpin this commitment, we provide education and training support for healthcare professionals consistent with legal requirements and maintain a significant investment in research and development. Our products are designed to be safe and reliable for their intended use and comply with or exceed all legal and regulatory requirements, including those concerning packaging, labelling and user instructions. We aim to anticipate future standards and requirements so that the health and safety of customers and patients is enhanced.

Community

We work with national and local governments and other organisations to meet our legal and civic obligations, manage our impact on the environment and contribute to the development of laws and regulations that affect our business interests. We strive to be a good corporate citizen by being an active member of our local communities and by encouraging and supporting employees who undertake community work.

We are committed to making continuous improvements to the management of our environmental, social and economic impacts, and to developing a sustainable business. We are committed to the protection of the environment by using renewable resources wherever possible and developing manufacturing processes and products that minimise adverse effects on the environment.

Governance and Compliance

Executive officers of the company are responsible for ensuring that this Code of Conduct is communicated to and observed by all employees. Day-to-day responsibility is delegated to the senior management of our businesses. It is their responsibility to implement these principles, if necessary through more detailed guidance tailored to particular business or local needs and requirements, and with the assistance of the Company's compliance professionals and other functional experts. Compliance with these principles and the responsibility for being familiar with them rests with every employee. Employees, by taking advice where appropriate, are also expected to be familiar with all applicable laws and industry codes governing their area of business and are expected to comply with all applicable laws and industry codes that apply to the Company's business, wherever it is conducted. Failure to follow these laws and industry codes may subject the employee to disciplinary action, up to and including termination.

Business Conduct

We are honest and fair in all aspects of our business, and we expect the same in our relationships with all those with whom we do business.

As a medical device manufacturer, we follow the codes published by AdvaMed in the United States, Eucomed in Europe, and similar industry codes of practice in other markets. The principles in these industry codes are aimed at protecting medical decision-making from improper inducements. Industry codes provide the basis for a minimum standard that would be acceptable in the industry. In all cases, any interactions with healthcare professionals and Government officials must comply with applicable laws and industry codes. If an activity involves more than one country (for example, a healthcare professional from one country performing services in another) you should take care to comply with the requirements in both countries, to the extent they apply.

You must not offer or make any improper payment (whether directly or indirectly, in cash or in kind) to any healthcare professional, Government official or any other person. You also must not encourage or allow others to offer or make improper payments.

You must not ask for or receive any improper payment (whether directly or indirectly, in cash or in kind) from any healthcare professional, Government official or any other person, or encourage or allow others to do so. These restrictions apply whether or not an improper payment may be seen by some as accepted business practice in a particular country or culture. You must keep to this section of this Code in each market in which we work – even if these standards are higher than those practised by others in the market and even if this may mean giving up certain business opportunities. The restrictions on improper payments do not cover legitimate and lawful payments to healthcare professionals for genuine business reasons.

You may not hire as an employee or a third-party representative any immediate family member of a healthcare professional or Government official to encourage them to use or buy our products or services or to obtain or retain business.

All meetings between you and healthcare professionals relating to Company business must be professional and for a proper purpose. You may carry out sales, promotional and other business meetings with HCPs to discuss, for example, product features, sales terms or contracts. You may make product education and training available to HCPs to help them use our products safely and effectively. These events should be carried out in clinical, educational, conference or other suitable settings, which may include a hotel or the HCP's premises. If events involve out-of-town travel for some HCPs, we may pay for their reasonable travel and modest accommodation costs in line with all relevant laws and industry codes.

Xstrahl values independent, educational, scientific or policy-making conferences that promote scientific knowledge and medical advancement and help in delivering effective healthcare. This includes:

- Conferences sponsored by national, regional or specialty medical associations;
- Conferences sponsored by accredited continuing medical education providers; and
- Other formal meetings at which physicians discuss the clinical case of one or more patients.

The Company may support a conference and, in some countries, sponsor healthcare professionals to go to a conference, in line with applicable laws and industry codes. You must never invite HCPs to meetings, or pay the costs for attending meetings, to reward or improperly induce the purchase of products. You may only include participants with a legitimate professional interest in the meeting.

You may not invite or pay any expenses for an HCP's personal guest. You may not hold meetings at venues that are lavish or extravagant for a business meeting or conference, or venues that are known principally for their entertainment facilities. It should be the meeting agenda that attracts attendees and not the associated travel, meals or location. So that you only focus on business matters, you may not provide any entertainment or recreational activities, such as theatre or sporting events (including golf, skiing and hunting), or vacation trips. Any travel, accommodation or other expenses associated with these meetings must be properly authorised and paid for in line with laws, industry codes and Company procedures. No other expenses will be paid.

You may provide a meal as a courtesy while conducting business, as long as you meet the Company's applicable limits and keep to applicable laws and industry codes. Meals must be modest in value, infrequent, not connected with an entertainment or recreational event, and provided in a setting appropriate for business discussion. You

may provide a meal only to those HCPs who actually go to the meeting. You may not provide a meal for an entire office staff if some do not go to or are not necessary participants at the meeting, or to an HCP's personal guest. You also may not provide a meal if you are not present at the meal.

You may offer gifts to HCPs or Government Officials when the gift is permissible under the applicable laws and industry codes. These gifts must be modest in value and infrequent. These gifts may include educational items that benefit patients or serve a genuine educational function. If gifts are allowed, their fair market value is decided based on the retail value, not the cost to the Company to buy the item.

In certain circumstances, it is appropriate for us to enter into arrangements with HCPs. Appropriate arrangements may include consulting, fellowships, professional meetings and speaking engagements, teaching, clinical studies and publications, license agreements, and research, grants and donations.

The choice of consultant is based on the Company's needs and the HCP's skills and experience. It is not affected by any improper considerations, such as past, present or future sales to the chosen HCP. Payments for consulting services must not exceed the fair market value for the services, using information on compensation from an independent organisation (if feasible).

We and our third-party representatives may never enter into improper financial arrangements with HCPs to reward them for buying or using a product.

All payments to HCPs or Government officials must be authorised in advance in line with the relevant procedures. All payments we make (or which third-party representatives or others make on our behalf) must be accurately recorded. This must include, at the very least, details of who receives the payment and the amount and purpose of the payment. You must never falsify or disguise transactions or records. The Company should make payments by electronic funds transfer whenever possible. Payments in cash are not permitted.

The Company may make grants or donations for educational, charitable or humanitarian purposes in line with all applicable laws and industry codes. Examples of acceptable grants or donations include: support for genuine independent medical research to advance medical science or education, as long as the grant has well-defined aims and milestones that are not linked to buying our products; or charitable organisations or accredited charitable purposes, such as to support care for those in most need, patient education, public education or to sponsor events where the proceeds are aimed at charitable purposes. Grants or donations must not be connected with any past, present or future purchases of our products or services.

All sales and marketing activities must be within the approved product labelling for the local market. You may only use promotional materials approved for use with customers in that market. Materials designed to educate patients about a disease state may also be considered Promotional Materials.

Under certain circumstances, you may give free products to healthcare professionals for evaluation purposes to allow them to assess products and decide whether and when to use, order, buy or recommend products in the future. Providing free products to HCPs to reward them for buying or using a product is prohibited.

We may provide accurate and fair information to explain the coverage of possible reimbursement and health economics on our products and services to HCPs. We may also help HCPs and others achieve favourable coverage decisions and adequate reimbursement levels from those who pay government and commercial health insurance. All information and help provided by us or on our behalf must be accurate, not misleading and keep to all applicable laws. We must not interfere with an HCP's independent clinical decision-making.

The use of any Company funds or assets for political contributions to any Government official or politician in any form (whether in cash, property, services or use of facilities) is strictly prohibited. It may be seen as a breach of local laws to give money or other items of value (travel expenses or entertainment, for example) to Government officials, whether or not connected with any business purpose. You must also use caution before contacting any elected Government official in circumstances that could be viewed as lobbying. If in doubt, consult Company professionals before you act.

Company Employees

Employees must maintain a work environment in which all feel welcome and free of harassment, discrimination or other improper conduct. Xstrahl does not tolerate improper conduct in the workplace. In daily work activities, you should behave with courtesy and consideration when interacting with other employees and people with whom the Company has business dealings. You should not engage in:

- Racial, religious or other stereotyping
- Derogatory jokes or gestures
- Physical or verbal conduct of a sexual, racist or defamatory nature
- Intimidating or aggressive acts
- Inappropriate humour
- Communicating or displaying offensive material in the workplace.

Breaches of this policy by any employee may be considered gross misconduct and result in disciplinary action including termination.

Both at work and in your free time, nothing you do should conflict with your responsibilities to the Company. No activity at work or at home should hurt the Company's reputation or good name. Mis-using Company resources or influence is also prohibited. Even when nothing wrong is intended, the appearance of a conflict can have negative effects. It is important to consider how your actions might appear, and to avoid the perception of a conflict of interest.

As a part of the hiring process, all employees must disclose if they have an immediate family member who is a healthcare professional or Government official. Additionally, disclose (in writing to your manager) any outside activities, financial interests or relationships that may present a conflict of interest or the appearance of one. Avoid actions or relationships that may cause potential conflicts or create the appearance of a conflict with your job or the Company's interests. Be wary of gifts or other benefits from those seeking business with Xstrahl, and do not accept any item or benefit of significant value where the purpose, effect or appearance is to influence your judgement. If in doubt, consult your manager.

Do not use Company resources, intellectual property, time or facilities for personal gain – this includes office equipment, email and computer applications. Do not take for yourself personally any opportunities that the Company could have an interest in that are discovered through the use of your Company position, information or property.

You should not disclose any of the Company's confidential or personal information except where authorised in connection with the conduct of Company business. If you believe you are compelled to make a disclosure, seek guidance from the Company's legal department. You must not use the Company's confidential information for any kind of personal gain, either during or after your time spent working for the Company. Confidential information includes all non-public information relating to the Company where the Company has an advantage from keeping it secret or would be disadvantaged if it were made public. The Company seeks vigorously to protect its intellectual property, and it is expected that you treat intellectual property as confidential information, and subject to this Code. You should not use in your work for the Company confidential information relating to other organisations, from a source outside of the Company, if there is a reason to believe it was obtained improperly. You must exercise caution in transmitting confidential information relating to the Company due to the open environment of electronic communication, and always do so in accordance with Company policy. The Company is committed to protecting personal information. You must comply with all policies and requirements that apply to the collection, use and retention of personal information. You are allowed to access or use data containing personal information only as required by your job function with the Company. The Company does not sell data containing personal information to third parties unless the Company has received specific authorisation to do so by individuals whose information is contained in the data.

Internet access and other electronic communication systems (such as email, instant messaging and voicemail) greatly aid the Company's day to day business. However, their use also raises security concerns. As a result, there are a number of precautions that must be taken to assure the integrity, confidentiality and safety of the Company's technology and information. Access to the Internet puts both your computer and the entire Company's information systems at risk. You are required to use only approved tools and methods for those activities. Although you may use Company electronic equipment for incidental personal matters, you are not guaranteed personal privacy when using the Company's information or communication systems. Since all documents and information on those systems are the Company's property, they are subject to review at any time. Subject to applicable law, the Company retains the

right to access and monitor information and communication systems, including employee email and other electronic documents, for all proper purposes. You may not use Company resources or communication systems for communications that:

- Contain abusive or objectionable language
- Contain information that is illegal or obscene
- Are likely to result in the loss or damage of the recipient's work or systems
- Are defamatory
- Interfere with your work or the work of others
- Solicit employees for an unauthorised purpose

You must observe the following in respect of the Company's contractual arrangements:

- All contracts must be properly authorised and signed by the correct number of authorised signatories. The Company's legal or Company secretary departments will advise on authorisation.
- A suitable due diligence exercise must be undertaken for each vendor that has significance to the business. This will form the basis of a selection and qualification process which in turn will seek to protect the Company's reputation by avoiding association with disreputable counterparties.

Marketplace Behaviour

Anti-trust and competition laws regulate, among other things, relations between competitors; distribution agreements; patent, copyright and trademark licenses; territorial restrictions on resellers and licensees; rebates and discounts to customers; and pricing policies. These laws generally prohibit agreements between the Company and our competitors that affect prices, terms and conditions of sale or fair competition. If you are responsible for areas where such laws apply, you must be aware of them and their implications and in particular, how they apply in the country where you operate. You or the Company may not have any arrangement with a competitor to:

- Discuss any bids, bid condition, discount, promotion or pricing information
- Agree on pricing
- Rig a bid or tender
- Allocate a market, or customers, or refuse to do business with another party

You or the Company must not unfairly undermine the products of a competitor, and any comparisons we draw between our product and those of our competitors must be accurate and factual. You or the Company may not use any unfair advantage over a competitor through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing. In general, you must conduct our operations in accordance with the principles of fair competition and in conformance with all applicable laws and industry codes.

The Company is subject to extensive government regulations. Compliance with these regulations contributes to business performance by helping to assure patient safety and enhance product performance. You must follow all Company procedures when performing job functions related to quality system management, third party manufacture of finished products, product safety, clinical investigations, control of promotional materials, customer complaints, adverse incidents, post-market surveillance, product recalls and advisory notices.

Criminal Finances Act 2017 (Tax Evasion)

In the light of Criminal Finances Act 2017, Xstrahl has adopted a statement of our corporate value on anti-facilitation of tax evasion.

It is our policy to conduct all of our business dealings in an honest and ethical manner. The value statement governs all our business dealings and the conduct of all persons or organisations who are appointed to act on our behalf.

We request all our employees and all who have, or seek to have, a business relationship with Xstrahl and/or any member of our Group, to familiarise themselves with our anti-tax evasion value statement and to act at all times in a way which is consistent with our anti-tax evasion value statement.

ANTI-TAX EVASION VALUE STATEMENT

Xstrahl and its subsidiaries has a zero tolerance approach to all forms of tax evasion, whether under UK law or under the law of any foreign country.

Employees and Associates of the Company must not undertake any transactions which:

- (a) cause the Company to commit a tax evasion offence; or
- (b) facilitate a tax evasion offence by a third party who is not an associate of the Company.

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter tax evasion facilitation.

At all times, business should be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented.

Employees and Associates must at all times adhere to the Xstrahl anti-tax evasion value statement and must ensure that they read, understand and comply with this policy.

It is not acceptable for team members and Associates to:

- a) Engage in any form of facilitating Tax Evasion or Foreign Tax Evasion
- b) Aid, abet, counsel or procure the commission of a Tax Evasion offence or Foreign Tax Evasion offence by another person;
- c) Fail to promptly report any request or demand from any third party to facilitate the fraudulent Evasion of Tax by another person, in accordance with this policy; or

- d) Engage in any other activity that might lead to a breach of this policy; or
- e) Threaten or retaliate against another individual who has refused to commit a Tax Evasion offence or a Foreign Tax Evasion offence or who has raised concerns under this policy
- f) An offence under the law of any part of the UK consisting of being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax.

PREVENTION THROUGH VIGILANCE

There is not an exhaustive list of Tax Evasion opportunities. At a more general level, the best defence against Tax Evasion and facilitation of Tax Evasion remains the vigilance of our employees and Associates and the adoption of a common-sense approach supported by our clear whistleblowing procedure. In applying common sense, team members must be aware of the following:

Is there anything unusual about the manner in which an Associate of the Company is conducting their relationship with the Company or the third party (usually a customer)?

Is there anything unusual about the customer's or Associate's conduct or behaviour in your dealings with them?

Are there unusual payment methods?

Unusual payment methods and unusual conduct of third parties with Company Associates can be indicative that a transaction may not be as it seems.

HOW TO RAISE A CONCERN

Our employees have a responsibility to take reasonable action to prevent harm to Xstrahl and we hold our employees accountable for their actions and omissions. Any actions that breach the Criminal Finances Act and the tax laws of wherever we operate brings harm to Xstrahl and will not be tolerated.

You are responsible for properly following Xstrahl's 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.

Appendix: Definitions

The Company means any unit of the Xstrahl group

Donation means any gift, whether in cash or in kind (including our products), given to a non-profit organisation and/or for charitable purposes.

Government official means:

- Any individual who holds a legislative, administrative or judicial position of any kind, whether appointed or elected, for a country or territory
- Any person acting in an official capacity on behalf of a government or any department, agency or instrumentality of a government;
- Any officer, employee or agent of a public international organisation such as the World Health Organization or the United Nations;
- Any officer, employee or agent of a political party or any person acting in an official capacity on behalf of a political party; and/or
- Any candidate for political office. An employee or consultant of a government-owned hospital or institution may be considered a Government Official under some laws.

Grant means any payment made with respect to: (a) HCP educational programmes such as continuing medical educational activities (including speaker expenses, facility expenses and modest meals for attendees); (b) patient education and advocacy groups, disease state screening or consumer health fairs; (c) funding for medical students, residents or fellows to attend educational conferences; or (d) independent medical research with scientific merit. Grants and Donations Committee means a committee authorised to consider requests for a Grant or Donation involving an HCP. A GBU may elect to use an independent third-party committee or agent to perform this function on its behalf.

Healthcare Professional or Healthcare Provider or HCP means those individuals or entities that are in a position to purchase, lease, recommend, use, arrange for the purchase or lease of or prescribe the Company's products or services. Examples include, but are not limited to, physicians, physician assistants, nurses, pharmacists, medical directors, investigators, researchers, account representatives employed by a customer, professional educators, hospitals, ambulatory surgical centres, group purchasing organisations, managed care organisations, insurers, employers, wholesalers and any individual employed by such entities with responsibility or authority to purchase, prescribe, recommend, influence or arrange for the purchase or sale of a Company product or service.

Improper payment means any financial payment or benefit improperly offered or made for the purpose of obtaining or retaining business or to gain any improper advantage for the person or entity making the payment for us. You should assume that a financial or other benefit to a Government Official is improper unless it is permitted or required by the applicable written law. Improper payments may include anything of value, provided overtly or covertly, in cash or in kind, including bribes,

kickbacks, gifts, donations, grants, hospitality, commissions or any sales arrangement, discount, rebate or equipment loan which is not made in accordance with this Code or the procedures adopted under this Code.

Personal Information means information in any format, electronic or print, that could identify an employee, agent, contractor, healthcare professional, customer or patient of a customer

Promotional materials means statements or pictures of products showing any feature or characteristic or making any claim about an intended or suggested use or appropriateness for any medical condition, whether in hard copy or electronic format. Promotional materials include labels, advertising, journal articles, reference texts, sales and marketing aids and exhibition displays.

Third Party representative means any distributor, sales representative or other third party that is engaged to market or sell our products to customers, or otherwise to interact with HCPs and Government Officials on our behalf.

Facilitation of Tax Evasion policy; for the purposes of the policy:

Associates includes company contractors or an agent of the Company (other than a contractor) who is acting in the capacity of an agent, or any person who performs services for and on behalf of the Company who is acting in the capacity of a person or business performing such services.

Tax Evasion means an offence of cheating the public revenue or fraudulently evading UK tax, and is a criminal offence. The offence requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent.

Foreign Tax Evasion means evading tax in a foreign country, provided that the conduct is an offence in that country and would be a criminal offence if committed in the UK. As with tax evasion, the element of fraud means there must be deliberate action, or omission with dishonest intent.

Tax Evasion Facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country by another person, or aiding, abetting, counselling or procuring the commission of that offence. Tax evasion facilitation is a criminal offence, where it is done deliberately and dishonestly.

Tax evasion is not the same as tax avoidance or tax planning. Tax evasion involves deliberate and dishonest conduct. Tax avoidance is not illegal and involves taking steps, within the law, to minimise tax payable (or maximise tax reliefs).

Tax means all forms of UK taxation, including but not limited to corporation tax, income tax, value added tax, stamp duty, stamp duty land tax, national insurance contributions (and their equivalents in any non-UK jurisdiction) and includes duty and any other form of taxation (however described).

Copies of all related policies, procedures and guidance documents can be accessed at the Company's website or from the HR Department.