

Corporate Criminal Offences Policy

About Bisley

The Bisley Office Furniture Group conducts its business from its manufacturing site at Newport in South Wales, Bagshot in Surrey and the showrooms located in Dallington Street, London and the Calico Building, Manchester. Bisley is a UK manufacturer of a wide range of steel storage products predominantly for the business workplace, with ranges designed for those working from home for both the UK and international markets. Bisley also manufactures industrial storage products designed for use in heavy engineering environments for both the commercial and private sectors.

Scope

FC Brown (Steel Equipment) Limited trading as Bisley, is committed to the Corporate Criminal Offence of Failure to Prevent the Criminal Facilitation of Tax Evasion, under the Criminal Finances Act, 2017.

Under this legislation a criminal offence is committed should any individual associated with Bisley knowingly and deliberately facilitate the evasion of tax payment by a taxpayer. This is applicable to not only employees of Bisley, but also other contractors and agents associated to the Company.

Principles and Procedures

The Criminal Finances Act, 2017 requires that an organisation have in place reasonable prevention measures. In order to ensure compliance with this legislation, the Company shall set in place stringent measures, including:

- Top-level commitment to build a corporate compliance culture.
- Risk profiling to assess vulnerability and strength of existing controls when dealing with various 'associated parties'.
- Due diligence with regards to ensuring that suppliers have effective prevention measures in place, discontinuing business with those that are not able to provide adequate assurance.
- Internal communication and provision of staff training with regards to requirements of legislation.
- Enabling a clear and confidential reporting pathway for whistle-blowers.
- To maintain, monitor and if necessary, enhance current operating procedures and controls that inhibit the ability of personnel to evade payment of tax, regularly reviewing these procedures to ensure effectiveness.

Responsibilities

It is the responsibility of all personnel employed by and associated with Bisley to ensure that this policy is adhered to.

Management and monitoring of preventative measures shall be carried out by senior management and leadership. The Board retains responsibility for overseeing development and deployment of all Company policies.

When to Speak Up

As an employee you commit to:

- Complying with this policy
- Reporting any concerns

If you have any concerns about any issues relating to our Corporate Criminal Office policy performance or management arrangements, speak to your line manager or if not appropriate a director of the Company.

Signed *R Costin*

Richard Costin
Chief Executive

Date 12th July 2023

