



Criminal Finances Act 2017 – Policy Statement

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Company: Shamrock Group Ltd
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Shamrock Group Ltd Criminal Finances Act 2017- Policy Statement

Shamrock Group has a zero-tolerance policy towards involvement in criminal facilitation of tax evasion by staff and all associated third parties.

We are committed to ensuring that our staff acts ethically that they comply fully with the Criminal Finances Act 2017.

Shamrock Group Ltd is committed to countering tax evasion risk and preventing criminal facilitation of tax evasion with suitable policies and procedures.

Our key principles for preventing facilitation of tax evasion are:

1. Risk based prevention procedures - Procedures are in place to prevent and detect facilitation of tax evasion by staff or associated persons. Clear reporting procedures are in place for suspected tax evasion or facilitation of tax evasion. A whistleblowing policy is in place to ensure concerns can be reported appropriately where required.
2. Top level commitment - Our Senior Management is committed to preventing facilitation of tax evasion and acting with the highest standards of business integrity.
3. Due diligence - Appropriate due diligence procedures are in place on associated third parties, both in the UK and internationally. We expect our third parties to have similar standards.
4. Communication and Training - Regular staff training on preventing facilitation of tax evasion is in place to ensure that prevention procedures are embedded.
5. Monitoring and reviewing – Prevention of facilitation of tax evasion procedures are regularly monitored and reviewed.

We require all our employees and third parties to comply with the Criminal Finances Act 2017 as enshrined in our key principles above, in the performance of their services for Ltd.

Company Director



Date 09/04/2026