CORPORATE CRIMINAL OFFENCE POLICY

1. Introduction

At CAPITAL SHIELD SECURITY LTD, we are committed to conducting our business with integrity, transparency, and in full compliance with all applicable laws and regulations. This Corporate Criminal Offence (CCO) Policy outlines our approach to preventing the facilitation of illegal financial activities by associated people under UK law.

2. Scope

2.1. **Applicability:** This policy applies to all directors, officers, employees, contractors, agents, subsidiaries, and any other individuals or entities acting on behalf of CAPITAL SHIELD SECURITY LTD.

2.2. **Tax Evasion Offences:** This policy specifically addresses the prevention of the facilitation of tax evasion offences under the **Criminal Finances Act 2017**.

3. Compliance with the Law

3.1. **Legal Compliance:** All associated persons must comply with the Criminal Finances Act 2017 and other relevant laws and regulations concerning the prevention of financial crimes.

3.2. **Awareness and Training:** We provide regular training and awareness programs to ensure that all employees understand their legal obligations and are equipped to identify and prevent illegal activities.

4. Risk Assessment

4.1. **Risk Identification:** We conduct regular risk assessments to identify areas of potential risk for the facilitation of tax evasion offences, both within the company and in our relationships with third parties.

4.2. **Risk Mitigation:** Where risks are identified, we implement appropriate measures to mitigate those risks and prevent the occurrence of financial crimes.

5. Policies and Procedures

5.1. **Internal Controls:** We maintain effective internal controls, policies, and procedures to prevent the facilitation of financial crimes by associated persons.

5.2. **Due Diligence:** We conduct due diligence on third parties, such as suppliers, contractors, and business partners, to assess their risk of involvement in financial crime tax-related offences and ensure they comply with applicable laws and regulations.

6. Reporting and Whistleblowing

6.1. **Reporting Violations:** All associated people are encouraged to report any suspected violations of this policy or any concerns regarding potential tax-related offences through the appropriate channels.

6.2. **Whistleblower Protection:** We provide protection for whistleblowers who report concerns in good faith, including confidentiality and non-retaliation.

7. Communication and Training

7.1. **Communication:** This policy is communicated to all associated people and made readily available through our appropriate channels.

7.2. **Training:** We provide training to relevant employees and individuals on the requirements of this policy and their responsibilities under the Criminal Finances Act 2017.

8. Compliance Oversight

8.1. **Compliance Monitoring:** [Director’s Name] (Managing Director) is responsible for monitoring compliance with this policy and conducting regular reviews to assess its effectiveness.

8.2. **Review and Update:** This policy will be reviewed periodically to ensure it remains current and effective in addressing the risks of tax evasion offences.

9. Acknowledgment

All associated people are required to read, understand, and acknowledge their commitment to comply with the principles and guidelines set forth in this Corporate Criminal Offence Policy.

10. Contact Information

For questions or concerns regarding this policy or to report a suspected violation, associated persons may contact info@capitalshieldsecurity.co.uk

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Signed:

Date: 1 January 2026