Halo Benefits

POLICY

Anti-Fraud, AML, Sanctions and Tax Evasion Prevention Policy

How we prevent fraud, money laundering and tax evasion.

UPDATED	VERSION	NEXT REVIEW
23 November 2026	2.0	November 2027

Halo Benefits Ltd · Owner: Dionne Clarke, Head of People & Partnerships · Classification: Internal & Public

Document control

Policy owner	Dionne Clarke, Head of People & Partnerships
Approved by	Board of Directors
Date approved	23rd November 2026
Next Review Date	23th November 2027
Review frequency	Annually
Applies to	All directors, employees, contractors and anyone acting on behalf of Halo Benefits Ltd
Related policies	Anti-Bribery and Corruption Policy, Code of Conduct and Business Ethics, Whistleblowing Policy

Version history

Version	Date	Summary of changes	Author
1.0	30 Oct 2026	First issue	Dionne Clarke
2.0	23 Nov 2026	Rebranded and restructured for clarity and readability	Dionne Clarke

Contents

1. Purpose of the policy 3
2. Scope 3
3. Preventing fraud 3
4. Protecting against payment fraud 3
5. Checking who we deal with 4
6. Sanctions 4
7. Money laundering 5
8. Preventing tax evasion 5
9. Training and responsibilities 5
10. Reporting concerns and breaches 6
11. Review 6

1. Purpose of the policy

This policy sets out how Halo Benefits Ltd prevents, detects and responds to fraud, money laundering, sanctions breaches and the facilitation of tax evasion.

We are not regulated by the Financial Conduct Authority and are not in the regulated sector under the Money Laundering Regulations 2017, so this is a proportionate, voluntary policy. It reflects our duties under the Fraud Act 2006, the Proceeds of Crime Act 2002, the Sanctions and Anti-Money Laundering Act 2018 and the Criminal Finances Act 2017, and good practice for a business that handles customer payments and data. The "failure to prevent fraud" offence in the Economic Crime and Corporate Transparency Act 2023 applies only to large organisations, but we have taken its guidance into account.

2. Scope

This policy applies to **Halo Benefits Ltd** (company number 17577358) and to all directors, employees, contractors and anyone acting on our behalf.

3. Preventing fraud

We do not tolerate fraud by staff, customers, suppliers or anyone else. Our core controls are:

- **Separation of duties:** the person who sets up a payee or raises a payment is never the person who approves it.
- **Payment approval:** every outgoing payment is approved by two authorised people, including at least one director, and larger payments need approval from two directors.
- **Expenses:** claims are supported by receipts and approved by someone other than the claimant.
- **Reconciliation:** bank accounts are reconciled at least monthly and reviewed by a director.
- **Access:** banking and finance systems use individual logins and multi-factor authentication, and access is removed promptly when someone leaves.

4. Protecting against payment fraud

Criminals sometimes pretend to be a supplier, customer or director to divert payments. To protect against this:

- any request to change bank details is checked by calling back on a phone number we already hold or have found independently, never one given in the request;
- the check is recorded and the change is approved by a second person;
- first payments to new or changed bank details are checked using Confirmation of Payee where available; and
- urgent or unusual payment requests, including those that appear to come from a director, are verified through a separate channel before payment.

5. Checking who we deal with

- We carry out proportionate checks on customers, suppliers and partners before working with them, including confirming their identity, checking Companies House or equivalent registers and, for higher-risk relationships, identifying who ultimately owns them.
- We apply extra checks where there are warning signs, such as unusual locations, complex ownership, pressure to pay into third-party accounts or reluctance to provide information.
- We do not accept cash, and do not make or receive payments to or from third parties unconnected with the contract without director approval.
- We identify whether anyone we deal with is a politically exposed person. This is not prohibited, but needs director approval and a check of the source of funds and any bribery risk.

6. Sanctions

We screen against the UK sanctions list and the Office of Financial Sanctions Implementation (OFSI) Consolidated List:

- all new customers, suppliers and partners, and their known owners, before we start working with them;
- all directors when they are appointed; and
- existing customers, suppliers and partners at least once a year, and whenever the lists change significantly, where practicable.

Results are recorded. Any possible match is escalated to our Ethics Director before any further dealing, and confirmed matches are frozen and reported to OFSI as required by law. We do not deal with people or countries subject to comprehensive UK sanctions.

7. Money laundering

No one may handle, hide or help with money or property they know or suspect to be the proceeds of crime. Warning signs include overpayments followed by requests for a refund to a different account, payments from unexpected sources, and unusual urgency or secrecy. Suspicions must be reported to our Ethics Director, who will decide whether to report to the National Crime Agency. Staff must never alert the person concerned.

8. Preventing tax evasion

Under the Criminal Finances Act 2017, a company can be guilty of failing to prevent people acting for it from helping others evade tax. Our prevention procedures follow HMRC's six principles:

HMRC principle	What we do
Risk assessment	The Board assesses every year where staff, contractors or partners could help someone evade tax, including through payroll and contractor arrangements
Proportionate procedures	Controls match our size and risk, including correct employment status and IR35 decisions, and refusing any request to issue false invoices or pay into undisclosed accounts
Top-level commitment	The Board has approved this policy and is clear that helping anyone evade tax is never acceptable, whatever the commercial benefit
Due diligence	Proportionate checks on contractors, agencies and partners who act for us
Communication and training	All staff receive this policy and training when they join and every year, and contracts include tax evasion prevention clauses
Monitoring and review	Controls are reviewed every year and after any incident, with changes reported to the Board

9. Training and responsibilities

All staff receive training on fraud, payment fraud, sanctions and tax evasion when they join and every year. Staff who can authorise payments receive specific training on payment checks.

- **Board of Directors:** approves payment authorities and limits, and carries out the annual risk assessment.

- **Ethics Director:** a designated director who handles suspicions, sanctions matches, approvals for politically exposed persons and decisions on external reporting.
- **Finance team and authorised signatories:** operate our payment controls.
- **Everyone:** follows this policy, stays alert to warning signs and reports concerns.

10. Reporting concerns and breaches

Suspected fraud, money laundering, sanctions breaches or tax evasion must be reported immediately to our Ethics Director, to **compliance@halobenefits.co.uk** or under our Whistleblowing Policy. Suspected cyber fraud, such as phishing or a compromised account, should also be reported to security@halobenefits.co.uk.

We investigate all reports, take steps to recover losses and report to the police, Action Fraud, the National Crime Agency, OFSI or HMRC as appropriate. Breaches of this policy are dealt with under our disciplinary procedure and may amount to gross misconduct.

11. Review

This policy is reviewed annually, and sooner after any significant change to our regulatory status, our business or the law. The Head of People & Partnerships proposes changes and the Board of Directors approves them.

> QUESTIONS ABOUT THIS POLICY?
> Contact Dionne Clarke, Head of People & Partnerships, at dionne@halobenefits.co.uk.