Anti-Fraud, Tax Evasion & Bribery Policy

Audience:	All colleagues, Board and Committee members, volunteers, contractors and partners acting on behalf of Moat Homes Limited (Moat)
Policy Owner:	Executive Director of Governance & Compliance
Policy Lead:	Head of Governance
Approved by:	Audit & Risk Committee, Moat Homes Limited (MHL Board)
Approved date:	February 2026
Next review date:	February 2029

1. Context, purpose and scope of the policy

Context:

We operate in a regulated sector where the loss of social housing assets, misuse of organisational funds, or failures to prevent financial crime can directly reduce the availability and quality of homes. We must meet strict regulatory, contractual and statutory obligations, including corporate criminal liability for failing to prevent fraud and tax evasion, alongside compliance with the Bribery Act 2010.

While we have effective governance controls, the evolving external environment – including expanded failure to prevent fraud offences under the Economic Crime and Corporate Transparency Act 2023 – requires clearer expectations, improved reporting routes and stronger alignment to our policy framework to ensure consistency, training coverage and documented accountability for colleagues and Board members.

Purpose:

This policy exists to:

- strengthen colleague and Board understanding of financial crime risks
- set out our zero-tolerance position and required behaviours
- improve reporting, detection and escalation of suspected fraud, tax evasion and bribery
- ensure a clear and consistent route for investigation, sanction and loss recovery
- strengthen prevention through mandatory training, risk monitoring and governance insight.

Scope:

This policy covers:

- internal fraud committed by permanent, temporary or agency staff and Board members
- externally generated fraud (e.g. by suppliers, advisors or contractors)
- collusion between colleagues, Board members and third parties.

The same principles apply, where appropriate, to:

- Board members
- agency staff
- agents, consultants and development partners.

This policy does not cover:

- detailed investigation steps
- safeguarding concerns unless directly linked to financial crime (see Safeguarding Adults at Risk Policy and Safeguarding Children Policy).

Operational detail on how concerns are reported, assessed and investigated is set out in the Fraud Response Plan, which supports this policy.

2. Definitions

- **Fraud:** Any act of deception, false representation, forgery, concealment, theft, conspiracy, collusion or abuse of position intended to secure gain or cause loss.
- **Bribery:** Offering, promising, giving, requesting or accepting any financial or non-financial advantage to improperly influence conduct or decision-making.
- **Tax evasion (corporate offence):** Failure to prevent an associated person from facilitating deliberate and dishonest tax evasion in the UK or overseas.
- **Irregularity:** A deliberate breach of controls or procedures indicating potential financial crime.
- **Moat Homes Limited (MHL Board):** The governing body of Moat Homes Limited, responsible for strategic direction, oversight, compliance and assurance.
- **Audit & Risk Committee (ARC):** A committee of the Board responsible for oversight of risk management, internal controls, audit, financial reporting and fraud prevention arrangements.

3. How this policy supports our strategy

- **Corporate Strategy:** Protects financial resilience and investment in safe, well-managed homes.
- **Tax Strategy:** Supports lawful, transparent tax compliance and professional oversight.
- **Value for Money Framework**: Reduces loss, repeat incidents and inefficiency.

- **Equality, Diversity & Inclusion Strategy:** Ensures investigations are fair, impartial and respectful.

4. Policy principles

Our approach to preventing, detecting and responding to fraud, tax evasion and bribery is guided by the following principles:

- We do not tolerate fraud, tax evasion, bribery or corruption in any form.
- We expect honest behaviour and responsible use of our resources.
- We prioritise strong governance, proportionate controls and clear accountability to minimise opportunities for financial crime.
- We encourage safe and timely reporting of concerns and support those who raise issues in good faith.
- All concerns are assessed objectively, lawfully and without bias, and individuals are treated with dignity and respect.
- We use insight from investigations and audits to strengthen controls and apply robust sanctions where wrongdoing is proven.
- We comply with UK and relevant international tax law and maintain proportionate procedures, including professional advice, to prevent the facilitation of fraud and tax evasion.

5. Aims and objectives

Aim: To protect our homes, services, assets and public revenue from fraud, tax evasion and bribery by maintaining a culture where financial crime risks are minimised, detected early and challenged safely, while meeting our corporate criminal obligations, including preventing the facilitation of fraud and tax evasion.

Objectives:

We will:

- Increase colleague and Board awareness through mandatory training and testing
- Improve fraud reporting rates and escalation clarity
- Strengthen insight from fraud trend analysis and governance reporting
- Ensure investigations follow a consistent route to sanction and recovery
- Maintain strong preventative controls with clear risk ownership and assurance.

6. Policy actions

Objective 1: Increase colleague and Board awareness through mandatory training and testing

We will:

- deliver mandatory Anti-Fraud, Anti-Bribery and Tax Evasion Prevention training for all colleagues and Board members
- carry out policy-based scenario testing at least annually for the Board and SLT
- promote this policy and the Fraud Response Plan through induction and refresher communications.

Accountability: Executive Director of Governance & Compliance, Head of Governance.

Objective 2: Improve fraud reporting rates and escalation clarity

We will:

- maintain confidential and accessible reporting routes through the Fraud Response Plan and Speak-Up channels
- reinforce expectations through regular communications on what to report and how concerns are handled
- require suspected financial crime to be escalated within 24 hours for triage and assessment.

Accountability: All colleagues and Board members, Head of Governance.

Objective 3: Strengthen insight from fraud trend analysis and governance reporting

We will:

- maintain a central fraud register capturing allegations, investigations, outcomes, sanctions and recovery actions
- review fraud trends, typologies and control weaknesses quarterly and report to ARC and via ARC, the MHL Board
- share annual learning summaries with senior leaders to inform training priorities and control improvements.

Accountability: Head of Governance, Audit & Risk Committee.

Objective 4: Ensure investigations follow a consistent route to sanction and recovery

We will:

- apply clear thresholds to assess whether matters should be reported to the Regulator of Social Housing, the police, HMRC or other statutory authorities
- cooperate fully with statutory authorities to support prosecution, ensuring that internal investigations do not compromise criminal proceedings
- investigate suspected fraud or financial crime lawfully, proportionately and impartially, with full regard for the rights and dignity of individuals involved
- apply the strongest appropriate sanctions where wrongdoing is proven, including disciplinary action, Board member removal and prosecution support
- take all reasonable steps to recover losses, including financial, asset or tenancy-related recovery routes.

Accountability: Executive Director of Governance & Compliance, supported by Executive Directors, People Services and legal advisors as required.

Objective 5: Maintain strong preventative controls with clear risk ownership and assurance

We will:

- implement and maintain effective systems of internal control to ensure our resources are used only for their intended purposes
- identify and manage fraud, tax evasion and bribery risks through corporate and directorate risk registers
- maintain a corporate fraud and financial crime risk assessment, updated in response to audit findings, investigations and emerging threats
- test control effectiveness through internal audit and assurance activity, with improvement actions tracked to completion.

Accountability: Executive Directors, Head of Risk & Assurance, Internal Audit.

7. Monitoring, reporting and review

To ensure delivery of our aim, we will monitor:

- **Fraud trends and typologies** – quarterly via the fraud register, reported to ARC
- **Reporting volumes and escalation timeliness** – quarterly to ARC
- **Investigation outcomes, sanctions and recovery progress** – quarterly to ARC and the MHL Board via ARC reporting
- **Financial and asset loss impact** – quarterly through governance reporting
- **Training and scenario testing compliance** – bi-annually to ARC.

The fraud register will receive a full assurance review at least annually at ARC, including confirmation of case closure, live investigations and control improvements.

Learning and control improvements will be reported to:

- **ARC** (quarterly)
- **MHL Board** (via ARC reporting)

This policy will be reviewed every three years, or sooner if legislation, regulation or investigation learning requires change.

8. Equality, diversity and inclusion

This policy will be delivered in line with our Equality, Diversity and Inclusion Policy.
An Equality Impact Assessment was completed for this policy and considered as part of the approval process.

9. Data protection

We use a risk-based approach to processing personal data in compliance with the General Data Protection Regulations (2018). This ensures that we assess any risks to privacy or to the rights and freedoms of people before commencing, commissioning or changing data processing activities. Our Data Protection Impact Assessment (DPIA) process was completed as part of the approval process.

10. Related legislation and regulations

- Public Interest Disclosure Act 1998
- Human Rights Act 1998
- Fraud Act 2006
- Bribery Act 2010
- Prevention of Social Housing Fraud Act 2013
- Economic Crime and Corporate Transparency Act 2023 (and the offence of Failure to Prevent Fraud)
- The Regulator of Social Housing's Economic and Consumer Standards.

11. Related policies and procedures

- Fraud Response Plan
- Standing Orders and Financial Regulations
- Delegated Financial Authorities Framework
- Anti-Money Laundering Policy
- Treasury Management Policy
- Safeguarding Adults at Risk and Safeguarding Children Policy
- Whistleblowing/Speak-Up Policy
- Corporate Criminal Tax Evasion Risk Assessment (Six Principles of Defence) - Appendix 1
- Anti-Fraud, Tax Evasion and Bribery Risk Assessment – Appendix 2
- Moat Corporate Criminal Evasion Risk Assessment – Appendix 3

12. Customer engagement

This policy relates to internal governance, financial controls and statutory compliance. As it does not change customer-facing service standards, formal customer consultation was not undertaken.

Document revision history

Date	Changes approved by	Details of changes made
Add your text here	Add your text here	Add your text here

Appendix 1: Corporate Criminal Tax Evasion Risk Assessment (Six Principles of Defence)

In formulating a robust defence, the guidance issued by HMRC focusses on the following six key principles of defence:

1.Risk assessment (determining the extent of potential exposure)
2.Top level commitment
3.Due diligence
4.Proportionality of reasonable procedures (demonstrating proportionate prevention procedures)
5.Communication and training
6.Monitoring and review

1. **Risk Assessment**

   In undertaking this risk assessment, the guidance is that "A firm should first undertake a risk assessment of the products and services it offers, as well as internal systems and client data that might be used to facilitate tax evasion, including 'sitting at the desk' of employees and other associated persons, considering the motive, means and opportunity for facilitating tax evasion."

   As part of our annual process the Risk Assessment (see Appendix 3) is reviewed at least annually in line with the Audit & Risk Committee timetable.

2. **Top Level Commitment**

   Moat articulates a no-tolerance policy with regard to fraud of any type or in any circumstance. Moat's Anti-Fraud, Tax Evasion & Bribery policy reflects resolve to prevent, detect and act upon all known cases of fraud, tax evasion, bribery, corruption and financial irregularity.

   Moat has Anti-Fraud, Tax Evasion & Bribery, Speaking Up (whistleblowing), and Anti-Money Laundering policies in place, all of which are reviewed regularly by the Audit & Risk Committee. The membership consists of Non-Executive Board Members. A report covering any incidents across these three areas goes to each Audit & Risk Committee meeting, whether action is required or not.

3. **Due diligence**

   HMRC guidance states 'The organisation applies due diligence procedures, taking an appropriate and risk-based approach, in respect of persons who perform or will perform services on behalf of the organisation, in order to mitigate identified risks.

The due diligence that Moat undertakes is sufficient given the low risk assessment above and that the activities Moat undertakes are all based in the UK. The majority of services performed for Moat are under written contract that have gone through our formal procurement processes and in respect of large service contracts and all development contracts, the contracts are subject to legal advice and / or drafting.

4. **Proportionality of reasonable procedures**

As noted above Moat's procurement activities are proportionate to the activities undertaken in the UK given the 'low' risk assessment.

Mandatory eLearning training for all staff is considered proportionate given the low risk and that there is not a need for bespoke training for individuals as Moat does not have roles at high risk of facilitating or undertaking tax evasion.

5. **Communication and training**

As noted above, Moat has Anti-Fraud, Tax Evasion & Bribery, Speak Up (Whistleblowing) and Anti-Money Laundering policies in place, all of which are reviewed regularly by the Audit & Risk Committee, communicated and accessible by staff.

Other relevant policies/procedures are in place on Payments and Benefits to Board members and Staff, Employee Code of Conduct, Gifts and Hospitality and Conflict of Interest.

All employee contracts incorporate the Employee Code of Conduct which in turn incorporates Moat's expectations around financial conduct.

It is mandatory for all staff to undertake Tax Evasion Awareness eLearning annually.

Finance / Governance & Compliance teams seek professional advice if they are unclear on issues around tax avoidance / evasion, should they arise.

6. **Monitoring and review**

These key defences will be reviewed every three years (or sooner if required) by the Audit & Risk Committee. Should significant issues emerge that would affect Moat's overall Risk Assessment we will update the assessment considering mitigations that can be put in place and report to Audit & Risk Committee if appropriate.

Moat's People Services (HR) team monitor compliance with the mandatory eLearning training requirements, chase up non-compliance and report as appropriate to line management and the Executive Team where appropriate.

Senior members of the Finance team liaise with Moat's tax advisers with regards to emerging issues on a regular basis.

Appendix 2: Anti Fraud, Tax Evasion and Bribery Risk Assessment

Area / Activity	Fraud or ML Risk	Nature of work / services	Risk Factors	Source of Funds	Owner	Risk Rating	Controls	Changes
Governance and Assurance								
Risk & Assurance / Governance	Money Laundering	Consumer Credit – Loans to leaseholders	Not yet in place – for future consideration. Legal advice sought as part of updating AML policy that this does not yet apply.		Chis Ellmore			Nothing loaned out
People and Communications								
People	Recruitment fraud	External – Gaining illegitimate employment	Reference Checks Documentation Checks Identification Validation	Identity Fraud Breach of Employment Law Bribery	Eleanor Dacey	Low	'Roles identified and requirements annotated that require DBS checks Reference checks Eligibility documents checked upon commencement (cannot be processed as a starter and paid without documents verified) External website to verify ID (Yoti) Sign off processes in place for new starters and processed through payroll Transparent policies and procedures in place	
	Financial fraud	Internal - Creating rogue employees for payroll payments	Payroll checks Service overspending on staff budget Service checks on payment of payroll to staff Ghost employees	Proceeds of Payroll	Chris Ellmore	Low	Sign off processes in place for new starters and processed through payroll interface between HR system and payroll bureau minimises human error Monthly payroll review and signoff by Financial Controller / Director of Accounting Services and Head of People Services Monthly payroll reconciliation to ledger	
Housing and Customer Services								
Neighbourhood Services	Tenancy fraud	External – Sub-letting, PRTB / RTA, succession fraud	Tenancy checks Documentation checks Third Party checks	Asset misappropriation Illegal letting Breach of tenancy	Chris Simmons	Medium	Policies and procedures Less face to face	

Area / Activity	Fraud or ML Risk	Nature of work / services	Risk Factors	Source of Funds	Owner	Risk Rating	Controls	Changes
		Internal – Letting properties illegitimately.						
Customer Operations – Customer Accounts	Money laundering (Proceeds of Crime)	External – Large over-payments to rent accounts and subsequent refunds for money laundering	Low volumes of transactions over £1000 All transactions are completed in-house Established customers History of customer payment profile Established CDD procedures for refunds	Customer rent account accrues credit from large payments (customer own funds or backdated benefit payments)	Joh Dullaway	Low	MLRO and Deputy CDD and EDD Record keeping arrangements Policies and procedures Training and awareness	Added Review of accounts on refunds
Development and New Business								
Shared ownership 1st tranche and re-sales	Money laundering	External - Use of property purchase as a vehicle for money laundering	High values of transactions Majority of transactions are non-face-to-face New / unknown customers	Savings / customers own funds Gift Inheritance Divorce settlements Proceeds of sale of property / assets	Jane Gardner/Sarah Butler	High	MLRO and Deputy CDD and EDD Record keeping arrangements Policies and procedures Training and awareness Credas	Deleted Interim CDD procedures during COVID-19 lockdown Added Credas
OMS property sales through MHG	Money laundering	External - Use of property purchase as a vehicle for money laundering	High values of transactions Majority of transactions are non-face-to-face Reliance on third-party CDD New / unknown customers No ongoing customer relationship	Savings / customers own funds Gift Inheritance Divorce settlements Proceeds of sale of property / assets	Jane Gardner/Sarah Butler	High	MLRO and Deputy CDD and EDD Record keeping arrangements Policies and procedures Training and awareness Credas	Deleted Interim CDD procedures during COVID-19 lockdown Added Credas
	Eligibility / allocation fraud risk	Residents / applicants being prioritised outside of eligibility rules Internal staff purchasing Moat properties	No eligibility Unfair Housing Allocation No criteria of allocation Abuse of position for purchasing properties		Jane Gardner/Sarah Butler		Management approval process HE / GLA eligibility requirements Probity – CEO / Board approval requirements Chief Exec Approval	Added Chief Exec Approval
	Tax evasion	Internal – Misuse of corporate subsidiary to avoid corporation tax – this was a risk in a previous organisation – MHG and MHL	Avoidance of tax calculations Breach of Tax laws Reputation Fines, Penalties and Sanctions Individuals charged with tax fraud	Profit Increase as less tax	Jane Gardner/Sarah Butler	Low	Policies and procedures Finance – speak to Chris Ellmore – manages development finance Tax Strategy approved by Audit Committee Tax charitable status discussed and reviewed	Added Mandatory Training Tax

Area / Activity	Fraud or ML Risk	Nature of work / services	Risk Factors	Source of Funds	Owner	Risk Rating	Controls	Changes
		may operate differently					annually, documentation to back up charitable status of sales maintained by S&M Gift Aid payments approved by Board Ad hoc visits/checks from HMRC Tax review by external auditors Tax compliance work performed by KPMG Staff training to ensure correct expertise Mandatory Training Tax	
Development	Bribery	External and Internal – Opportunity for staff to accept extravagant gifts and hospitality from contractors, accept inflated extras and additions to development costs, appoint suppliers on back of gifts and hospitality or close relationships, agreeing higher land payments for financial gain	Gifts and Hospitality register and policy Bribes	Proceeds of incentives	Jane Gardner/Sarah Butler	Low	Due diligence procedures Procurement / contracts in place with suppliers Declaration of interest procedure to identify Conflicts Gifts and hospitality CPC process identifies contractor exposure and contractor performance and EA complete a VfM statement for build costs as part of the approval process – audited process Independent valuations on all land purchases Required. HE / GLA audits completed on random sample of new build / sales	
Property Services	Bribery	External and Internal – Opportunity for staff to accept inflated quotes, raise unnecessary works orders and authorise payments, favour contractors / suppliers	Tender process Independent verification of quotes Work order management system Delegated authority for payments	Financial Incentives Breach of Procurement rules Adverse selection process	Garry Knight	Low	Due diligence procedures Whistleblowing Contracts in place for the delivery of compliance workstreams and use of accredited contractors. System controls in place to prevent unauthorised changes to H&S liabilities Asset Management Team have responsibility for data input, validation and reconciliation Contracts in place for the delivery of repairs and maintenance	
Finance and Corporate Services								
Procurement	Bribery	External and Internal - Opportunity for supplier fraud,	High value of transactions	Funds	Robert Lewins	Low	Training delivered to key Moat staff involved in procurements to increase awareness of legislative	

Area / Activity	Fraud or ML Risk	Nature of work / services	Risk Factors	Source of Funds	Owner	Risk Rating	Controls	Changes
		creating false suppliers or suppliers for personal gain					requirements and consequences of non-compliance All PCR2015 tenders to be led by Procurement who will apply their understanding of the legislation. Procurement Pipeline and Contracts Register highlight (known/potential) upcoming projects Procurement policy and procedures in place E-tendering portal provides management trail to support defence of any claims received	
Information Systems	Cyber fraud	External – Access to Moat data or financial systems through phishing, denial of service by ransomware etc.	Cyber Security Penetration testing Internal Phishing Campaigns Ongoing evaluation of security threats and available relevant mitigations (such as implementing an additional security product)	Funds Use of Critical and personal Data	Sarah Barraclough-Hatch	Low	mandatory training and support regarding cyber-attacks Cyber security testing, both cyclical and unplanned, including penetration testing Robust email and file scanning and interception software. Cyber security attack approach and response plans, and regular testing. Fully hosted Managed Detect and Respond (MDR) Firewall change controls in place Intrusion detection and prevention system in place Key policies in place and security, acceptable use, 3rd party and software standards Wi-Fi access restricted to internet only via segregated feed Network access control Quarterly phishing simulations and rewarding positive reporting of suspicious emails Ongoing evaluation of security threats and available relevant mitigations (such as implementing an additional security product) Ongoing colleague awareness programme Yubikeys – phishing resistant and also Netskope as a ZTNA solution (zero-trust network access	Added Yubikeys – phishing resistant and also Netskope as a ZTNA solution (zero-trust network access

Area / Activity	Fraud or ML Risk	Nature of work / services	Risk Factors	Source of Funds	Owner	Risk Rating	Controls	Changes
Accounting Services / Procurement	Financial / payments to suppliers	External and Internal - Opportunity for supplier and internal fraud, creating false suppliers, payment of duplicate invoices	High frequency of transactions Delegated authority No authorisation Supplier set up outside of procurement Duplicate payments Cheques not on the log	Funds	Chris Ellmore	Low	'Purchase Order system used to control authorisation, receipt and payment of expenditure Expenditure is authorised in line with approved delegated authorities Payment run controls - sample and larger items checked to invoice; senior management sign-off Individual payments - clear authorisation process; segregation of roles able to set-up, authorise and release payments Supplier set - up process by Procurement Team Supplier changes - segregation of roles able to change supplier details, review of changes to suppliers Duplicate payment check Cheques >£10k require special approval; Cheque log maintained CPC approval for all development expenditure; Capital approval (non CPC) process Quarterly reporting / monitoring of orders processed after invoice	
	Tax evasion	Internal – Failing to prevent suppliers committing tax evasion	Non Vatable invoices Correct VAT rates on invoices Supplier not registered	Non taxable funds	Chris Ellmore	Low	Tax Strategy approved by Audit Committee Tax charitable status discussed and reviewed annually, documentation to back up charitable status of sales maintained by S&M Gift Aid payments approved by Board Ad hoc visits/checks from HMRC Tax review by external auditors Tax compliance work performed by KPMG Staff training to ensure correct expertise	
Insurance	Insurance fraud	External and Internal – Inflating losses for financial benefit / gain	High frequency of transactions High value of transactions – potential for high financial gain Administration of claims is supported by internal officers –	Paid direct by insurers / third party	Paul Casey	Medium	Declaration / conflict of Interest process Segregation of duties to facilitate claims administration / no one person responsible	

Area / Activity	Fraud or ML Risk	Nature of work / services	Risk Factors	Source of Funds	Owner	Risk Rating	Controls	Changes
			opportunity for collusion Ad-hoc training					
Sales and Marketing	Money Laundering	External - Use of property purchase as a vehicle for money laundering	High values of transactions Majority of transactions are non-face-to-face Reliance on third-party CDD New / unknown customers	Savings / customers own funds Gift Inheritance Divorce settlements Proceeds of sale of property / assets Currency trading	Chris Ellmore	Medium	MLRO and Deputy CDD and EDD Record keeping arrangements Policies and procedures Training and awareness	

Appendix 3: Moat Corporate Criminal Evasion Risk Assessment

Risk Factors	Analysis	Assessment
Small, medium or large sized business?	Multi-national large businesses have a different risk profile to small domestic businesses. Moat has a simple group structure with the majority of transactions going through the main legal entity Moat Homes Limited (MHL). Outside that Moat Housing Group (MHG) has limited open market sales activity, Moat Homes Finance Limited has a listed Bond and Moat Foundation has charitable activities of circa. £100k pa. The subsidiary companies do not have any employees of their own.	**Low**
Part of a group? Does it have complex operations?	Most transactions go through MHL. Operations are not complex with the majority of activity supporting the development of new affordable homes and the management of existing affordable homes and residents.	**Low**
Does the business operate outside the UK?	No.	**Low**
Does the business make use of subcontractors or agents?	Moat subcontracts out its new development activity to developers and contractors, in all cases through formal legal agreements that are drafted / negotiated by reputable lawyers. Moat subcontracts much of its repair and maintenance activity with the set-up of procurement and contractual arrangements being overseen	**Low - Medium**

	and coordinated by an in-house professional procurement team and for significant contracts with the help of legal advisers.	
Is the business involved in any JV's?	Moat does not have any Joint Ventures that are separate legal entities. It does have a handful of contractual joint ventures that are more like profit sharing arrangements, but where Moat has significant contractual control.	**Low**
Is the business about to enter into a new business relationship?	Moat is not currently intending to merge with anyone or set up any new products or activities.	**Low**
Is the country in which the business operates high risk by perceived levels of secrecy or use as a tax shelter?	No. All UK	**Low**
Is the business involved in a trade sector where there is a higher risk of facilitating tax evasion than others, such as financial services, tax advisory and legal sectors?	No. Moat operates in the social housing sector and does a small proportion of new build development through its subsidiary, MHG.	**Low**
Does the type of transaction which the business is involved in give rise to higher risks, for example, complex tax planning structures involving high levels of secrecy, overly complex supply chains, or transactions, or involving politically exposed persons? (Guidance states that: *"Certain sectors such as accounting, financial services, tax advisory, real estate and legal are at higher risk")*	No. Moat activities are associated with the provision of new affordable housing and the provision of social housing services to existing residents. In relation to shared ownership and market sales transactions, these are all undertaken through reputable solicitors in accordance with formal conveyancing processes - no transactions are in cash. In relation to existing residents' rents and service charges are collected on a monthly (some weekly) basis and periodic tenancy checks are undertaken.	**Low**
Internal policies and culture	We do not have a culture that rewards excessive risk taking (for example, in the form of incentives and bonuses).	**Low**

	Moat has a strong governance and compliance culture with a majority of independent non-executive directors making up the Board who are remunerated at below equivalent private sector levels but have a common desire to contribute to housing need through the provision of quality affordable homes while ensuring the business complies with the Standards required by the Regulator of Social Housing.	
Policies and Training	Employees undertake annual mandatory eLearning training to ensure that they are aware of Moat's policies and procedures with regard to financial crime and to ensure they can identify tax evasion and know their responsibilities (and how to) report. In addition, Moat has had Anti-Fraud & Bribery, Whistle Blowing and Anti-Money Laundering policies in place for many years, all of which are reviewed regularly by the Audit & Risk Committee. A report covering any incidents across these three areas goes to each Audit & Risk Committee meeting, whether action is required or not Further relevant policies include: • Policy on Payments and Benefits to Board members and Staff • Employee Code of Conduct • Gifts and Hospitality • Conflict of Interest procedures	**Low**

Moat's overall Corporate Criminal Evasion risk is assessed as '**Low**'.