



ATERIAN PLC
("Aterian" and/or the "Company")

Tax Evasion Policy

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1. INTRODUCTION

Aterian plc (“Aterian”) is committed to conducting its business in an ethical and responsible manner, which includes complying with all UK and foreign applicable tax laws and regulations. This Tax Evasion Policy outlines Aterian's commitment to preventing tax evasion and sets out the framework within which all employees and stakeholders must operate to ensure compliance.

2. POLICY STATEMENT

Aterian plc strictly prohibits any form of tax evasion, including but not limited to fraudulent activities, deliberate non-compliance with tax laws, and the use of abusive tax schemes. Aterian is committed to conducting its tax affairs transparently, responsibly, and in full compliance with all applicable tax laws and regulations.

3. RESPONSIBILITIES

3.1. Senior Management: The senior management of Aterian holds the ultimate responsibility for ensuring compliance with tax laws and regulations. They are responsible for creating a culture of tax compliance, providing appropriate resources, and establishing robust internal controls to prevent tax evasion.

3.2. Employees and Stakeholders: All employees and stakeholders, including directors, officers, contractors, suppliers, and consultants, must act in accordance with this policy and diligently fulfil their tax obligations. They must report any suspected tax evasion or non-compliance promptly to the appropriate channels.

4. TAX PLANNING

Aterian recognizes the importance of legitimate tax planning to ensure the efficient management of its tax affairs. However, tax planning must always be conducted in line with the principles of transparency, integrity, and compliance with the spirit and letter of tax laws. Aterian will not engage in aggressive tax planning or schemes that are solely designed to evade tax.

5. REPORTING SUSPECTED TAX EVASION

Aterian encourages a culture of openness and responsibility, where any suspected tax evasion or non-compliance can be reported without fear of reprisals. Employees and stakeholders are required to promptly report any concerns or suspicions regarding potential tax evasion to their immediate supervisor, the internal audit department, or through an established whistleblowing mechanism.

6. TRAINING AND AWARENESS

Aterian is committed to providing regular training and awareness programs to its employees and stakeholders regarding tax evasion, relevant laws and regulations, and the company's expectations regarding tax compliance. This training will help individuals identify and understand potential tax evasion risks and reinforce their responsibilities.

7. COMPLIANCE MONITORING AND REVIEW

Aterian will conduct periodic reviews and assessments of its tax policies, procedures, and controls to ensure their effectiveness and compliance with applicable laws and regulations. The company will also engage independent third-party experts to provide objective evaluations of its tax compliance practices.

8. CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with this Tax Evasion Policy may result in disciplinary action, including but not limited to warnings, termination of employment, and legal action where appropriate. Aterian reserves the right to report suspected tax evasion to the relevant authorities.

9. COMMUNICATION AND IMPLEMENTATION

Aterian will ensure that this Tax Evasion Policy is communicated to all employees, stakeholders, and relevant third parties. The policy will be made readily accessible through the company's intranet or other appropriate channels. It will also be reviewed periodically to ensure its continued relevance and effectiveness.

This Tax Evasion Policy reflects Aterian plc's commitment to ethical business practices and compliance with tax laws. It aims to foster a culture of transparency and responsibility, demonstrating the company's dedication to acting as a responsible corporate citizen.