

WU07 ✓

Notice of progress report in a winding-up
by the court



Companies House

FRIDAY



A09 *A7XFBV1AG* 18/01/2019 #322
COMPANIES HOUSE

1	Company details	
Company number	0 6 3 1 8 1 7 1 ✓	→ Filing in this form Please complete in typescript or in bold black capitals.
Company name in full	A.S. VALENTINO'S LIMITED	
2	Liquidator's name	
Full forename(s)	Dominic	
Surname	Dumville	
3	Liquidator's address	
Building name/number	Haslers	
Street	Old Station Road	
Post town	Loughton	
County/Region	Essex	
Postcode	I G 1 0 4 P L	
Country		
4	Liquidator's name ①	
Full forename(s)	Nicholas W	① Other liquidator Use this section to tell us about another liquidator.
Surname	Nicholson	
5	Liquidator's address ①	
Building name/number	Haslers	① Other liquidator Use this section to tell us about another liquidator.
Street	Old Station Road	
Post town	Loughton	
County/Region	Essex	
Postcode	I G 1 0 4 P L	
Country		

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6 Period of progress report

From date	^d	^d	^m	^m	^y	^y	^y	^y
	2	0	1	1	2	0	1	7
To date	^d	^d	^m	^m	^y	^y	^y	^y
	1	9	1	1	2	0	1	8

7 Progress report

☒ The progress report is attached

8 Sign and date

Liquidator's signature

Signature

X



X

Signature date

^d	^d	^m	^m	^y	^y	^y	^y
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Presenter information

You do not have to give any contact information, but if you do it will help Companies House if there is a query on the form. The contact information you give will be visible to searchers of the public record.

Contact name **Dominic Dumville**

Company name **Haslers**

Address **Old Station Road**
Loughton

Post town **Essex**

County/Region

Postcode **I G 1 0 4 P L**

Country

DX

Telephone **020 8418 3333**



Checklist

We may return forms completed incorrectly or with information missing.

Please make sure you have remembered the following:

- ☐ The company name and number match the information held on the public Register.
- ☐ You have attached the required documents.
- ☐ You have signed the form.



Important information

All information on this form will appear on the public record.



Where to send

You may return this form to any Companies House address, however for expediency we advise you to return it to the address below:

The Registrar of Companies, Companies House,
Crown Way, Cardiff, Wales, CF14 3UZ.
DX 33050 Cardiff.



Further information

For further information please see the guidance notes on the website at www.gov.uk/companieshouse or email enquiries@companieshouse.gov.uk

This form is available in an alternative format. Please visit the forms page on the website at www.gov.uk/companieshouse

A.S. VALENTINO'S LIMITED
(In Liquidation)
Joint Liquidators' Summary of Receipts & Payments

Statement of Affairs £		From 20/11/2017 To 19/11/2018 £	From 20/11/2014 To 19/11/2018 £
123,019.00	ASSET REALISATIONS		
	Director's Loan Account	NIL	NIL
		NIL	NIL
	COST OF REALISATIONS		
	O.R. Debit Balance	NIL	1,070.00
	Bank Charges	88.00	352.00
		(88.00)	(1,422.00)
123,019.00		(88.00)	(1,422.00)
	REPRESENTED BY		
	ISA NIB		(1,422.00)
			(1,422.00)

A.S. VALENTINO'S LIMITED – IN COMPULSORY LIQUIDATION

**LIQUIDATORS' PROGRESS REPORT TO CREDITORS AND MEMBERS
FOR THE YEAR ENDING 19 NOVEMBER 2018**

EXECUTIVE SUMMARY

The Company was wound up on 3 March 2014 following a petition presented by HM Revenue & Customs ("HMRC") and Nicholas Nicholson and my former colleague, Stratford Hamilton were subsequently appointed Joint Liquidator on 20 November 2014. As previously reported, following his departure from the firm, I replaced Stratford Hamilton in accordance with an Order of the High Court dated 13 October 2017.

The handover papers received from the Official Receiver did not provide details of any realisable assets but indicated that the Director, Petros Skofidakis, was liable to the Company in the sum of £123,020 in respect of an overdrawn Directors Loan Account ("DLA").

An investigation into the Company's affairs was carried out, utilising core accounting records and Company filed accounts in the absence of any books and records requested from the Director, for the purpose of establishing whether there were any hidden assets worth pursuing. The investigations identified potential claims to the Liquidators, estimated to be in the region of a £208,000 claim.

Despite many requests for information and the repayment of the loan, the Director remained uncooperative at every stage and as a result, Stratford Hamilton instructed Moon Beever, to commence Bankruptcy proceedings in his name. Stratford was subsequently appointed Joint Trustee of his estate on 17 November 2016.

The Liquidation will remain open until recoveries are made within the bankruptcy estate or until all potential avenues of recovery are exhausted.

STATUTORY INFORMATION

Company name:	A.S. Valentino's Limited		
Company number:	06318171		
Trading address:	15-33 Middle Chare, Chester Le Street, County Durham, DH3 3QD		
Registered office:	Haslers, Old Station Road, Loughton, IG10 4PL		
Former registered office:	3 Barras House, Front Street, Burnopfield, Newcastle upon Tyne, NE16 6PY		
Principal trading activity:	Restaurant		
Liquidators' names:	Dominic Dumville	Nicholas Nicholson	Stratford Hamilton
Date of appointment	13/10/2017	20/11/2014	20/11/2014
Date removed:			13/10/2017
Liquidators' address	Old Station Road, Loughton, Essex, IG10 4PL		
Court name and reference	High Court of Justice 00382 of 2014		
Actions of Joint Liquidators'	Any act required or authorised under any enactment to be done by a Liquidator may be done by either or both of the Liquidators acting jointly or alone.		

LIQUIDATORS' ACTIONS SINCE LAST REPORT

Since my last report my focus has been to adhere to my statutory obligations whilst I have monitored the investigations into potential assets within the bankruptcy. A distribution to creditors from the Joint Trustees in Bankruptcy is the only source of a recovery in these proceedings. I intend to keep this liquidation open until the outcome for the Bankruptcy creditors is known.

There is certain work that I am required by the insolvency legislation to undertake in connection with the liquidation that provides no financial benefit for the creditors. A description of the routine work undertaken since my appointment as Liquidator is contained in Appendix A.

RECEIPTS AND PAYMENTS

My Receipts & Payments Account for the period from 20 November 2017 to 19 November 2018 is attached. The is currently a negative balance in the Insolvency Services Account.

ASSETS

As indicated above, the only realisable asset within this Liquidation was the overdrawn DLA and our many requests to repay the amount of £123,019 was continually ignored by the Director.

My investigation into the disposal of assets in the amount of £84,910 as denoted in the last set of filed accounts was also unsuccessful.

Potential assets may be identified in the bankruptcy of the Director and the Liquidation will therefore remain open should this be the case.

LIABILITIES

SECURED CREDITORS

An examination of the Company's mortgage register held by the Registrar of Companies, showed that the Company has no current charges over its assets.

The legislation requires that if the Company has created a floating charge after 15 September 2003, a prescribed part of the Company's net property (i.e. the money that would otherwise be available to the charge holder) should be ring-fenced for distribution to unsecured creditors. In this case there were no creditors secured by a floating charge such that the prescribed part provisions do not apply.

PREFERENTIAL CREDITORS

The handover papers received from the Official Receiver did not anticipate any preferential creditors and no such claims have been received.

CROWN CREDITORS

The handover papers received from the Official Receiver included £53,263.29 owed to HMRC. HMRC's final claim of £72,642.23 has been received.

UNSECURED CREDITORS

There were two unsecured creditors (other than HMRC) with an estimated liability of £115,958.00. No further claims have been received.

DIVIDEND PROSPECTS

The timing and quantum of a dividend is difficult to predict at this stage as this is now solely reliant on the success of any claims within the bankrupt's estate.

INVESTIGATION INTO THE AFFAIRS OF THE COMPANY

I undertook an initial investigation into the Company's affairs to establish whether there were any potential asset recoveries or conduct matters that justified further investigation, taking account of the public interest, potential recoveries, the funds likely to be available to fund an investigation, and the costs involved.

Specifically, I recovered, listed and reviewed the Company's accounting records; obtained and reviewed copy bank statements for the months prior to the Company ceasing to trade from the Company's bankers; and compared the information in the Company's last set of accounts with that contained in the statement of affairs lodged in the liquidation and made enquiries about the reasons for the changes.

As indicated previously, on a review of the last set of annual Company accounts for the period ending 31 December 2012, the outstanding DLA of £123,019 and a disposal of assets worth £84,910 are recorded. It was unclear as to the whereabouts of the disposed assets and I continued my investigations in an attempt to uncover more information. My investigations did not return any results in this regard and I believe it would be uneconomical to pursue this course of action any longer.

The Liquidation will remain open until all avenues of recovery are exhausted within the bankruptcy of Mr Skotidakis.

LIQUIDATORS' REMUNERATION

My remuneration was approved on a time cost basis at a meeting of creditors held on 6 January 2015. My total time costs to 19 November 2018 amount to £34,667 representing 114.08 hours of work at an average charge out rate of £303.87 per hour, of which £2,059, representing 10.60 hours of work, was charged in the period since 20 November 2017 at an average charge out rate of £194.25 per hour.

I have not been able to draw any remuneration in this matter.

Schedules of my time costs incurred to date and in the period from 20 November 2017 to 19 November 2018 are enclosed.

Further information about creditors' rights can be obtained by visiting the creditors' information micro-site published by the Association of Business Recovery Professionals (R3) at <http://www.creditorinsolvencyguide.co.uk/>. A copy of 'A Creditors Guide to Liquidators' Fees' also published by R3, is available at the link <https://www.haslers.com/services/insolvency/> under the tab 'Tools and Resources'. Please note that there are different versions of the Guidance Notes and in this case you should refer to the November 2011 version. Please note that further details are also included in the practice fee recovery sheet. An explanatory note which shows Haslers' fee policy is enclosed with this report.

LIQUIDATORS' EXPENSES

I have incurred expenses to 19 November 2018 of £2,331.20, none of which was incurred in the period since 20 November 2017.

I have not been able to draw any expenses in this matter.

I have used the following agents or professional advisors in the reporting period:

Professional Advisor	Nature of Work	Basis of Fees
Moon Beaver	Solicitors	Conditional Fee Arrangement

My solicitors' fees to 19 November 2018 are in the sum of £3,376.25, none of which has been incurred since 20 November 2017.

The choice of professionals was based on my perception of their experience and ability to perform this type of work and the complexity and nature of the assignment. I also considered that the basis on which they will charge their fees represented value for money. I have reviewed the charges they have made and am satisfied that they are reasonable in the circumstances of this case.

FURTHER INFORMATION

An unsecured creditor may, with the permission of the Court, or with the concurrence of 5% in value of the unsecured creditors (including the creditor in question), request further details of the Liquidators' remuneration and expenses within 21 days of their receipt of this final account. Any secured creditor may request the same details in the same time limit.

An unsecured creditor may, with the permission of the Court, or with the concurrence of 10% in value of the unsecured creditors (including the creditor in question), apply to Court to challenge the amount of remuneration charged by the Liquidators as being excessive, and/or the basis of the Liquidators' remuneration, and/or the amount of the expenses incurred as being excessive, within 8 weeks of their receipt of this final account. Any secured creditor may make a similar application to court within the same time limit.

To comply with the Provision of Services Regulations, some general information about Haslers can be found in the attached summary sheet.

SUMMARY

The Liquidation will remain open until all matters pertaining to the bankruptcy of Mr Skotidakis have been fully resolved. I estimate that this will take approximately 18 months and once resolved the Liquidation will be finalised and my files will be closed.

If creditors have any queries regarding the conduct of the Liquidation, or if they want hard copies of any of the documents made available on-line, they should contact Aimee Mohsen by email at Aimee.Mohsen@Haslers.com, or by phone on 020 8418 3432.



DOMINIC DUMVILLE
JOINT LIQUIDATOR

Appendix A

1. Administration

- Dealing with all routine correspondence and emails relating to the case.
- Maintaining and managing the office holder's estate bank account.
- Maintaining and managing the office holder's cashbook.
- Undertaking regular bank reconciliations of the bank account containing estate funds.
- Undertaking periodic reviews of the progress of the case.
- Overseeing and controlling the work done on the case by case administrators.
- Preparing, reviewing and issuing an annual progress report to creditors and members.
- Filing returns at Companies House.
- Preparing and filing Corporation Tax returns.

2. Creditors

- Maintaining up to date creditor information on the case management system.

A.S. VALENTINO'S LIMITED
(In Liquidation)

Joint Liquidators' Summary of Receipts and Payments

RECEIPTS	Statement of Affairs (£)	From 20/11/2014 To 19/11/2017 (£)	From 20/11/2017 To 19/11/2018 (£)	Total (£)
Director's Loan Account	123,019.00	0.00	0.00	0.00
		0.00	0.00	0.00
PAYMENTS				
O.R. Debit Balance		1,070.00	0.00	1,070.00
Bank Charges		264.00	88.00	352.00
		1,334.00	88.00	1,422.00
Net Receipts/(Payments)		(1,334.00)	(88.00)	(1,422.00)
MADE UP AS FOLLOWS				
ISA NIB		(1,334.00)	(88.00)	(1,422.00)
		(1,334.00)	(88.00)	(1,422.00)

AS Valentinos Limited

Analysis of time costs from 20/11/14 to 19/11/18

Categories	Time recorded (Hours)						Total Time	Total Sum of Charge	Average Hourly Rate
	Partner	Manager	Senior Administrator	Administrator	Junior				
GENERAL CASE ADMINISTRATION									
Case Planning	4.10	2.50	1.00	0.80	7.28	15.68	3,923.50	250.17	
Administrative Set-up		5.80				5.80	1,595.00	275.00	
Appointment Notification		3.90			1.10	5.00	1,177.00	235.40	
Maintenance of Records	0.40	4.20	0.40	1.90	0.90	7.80	1,865.00	239.10	
Statutory Reporting		10.00	3.20	1.80	1.00	16.00	4,010.00	250.63	
Non-formal app Work		0.50				0.50	152.50	305.00	
INS Cashiering				2.90		2.90	288.50	99.48	
Total	4.50	26.90	4.60	7.40	10.28	53.68	13,011.50	242.38	
REALISATION OF ASSETS									
Debt Collection				0.70		0.70	84.00	120.00	
Total				0.70		0.70	84.00	120.00	
INVESTIGATIONS									
Investigating Antecedent Transactions	23.60	29.40			0.10	53.10	19,743.50	371.82	
Total	23.60	29.40			0.10	53.10	19,743.50	371.82	
CREDITORS									
Creditors' Claims (inc. Employees and Preferential		0.70				0.70	213.50	305.00	
Total		0.70				0.70	213.50	305.00	
CASE SPECIFIC MATTERS									
Case Specific Matters		4.90			1.00	5.90	1,614.50	273.64	
Total		4.90			1.00	5.90	1,614.50	273.64	
	28.10	61.90	4.60	8.10	11.38	114.08	34,667.00	303.87	

AS Valentinios Limited

Analysis of time costs from 20/11/17 to 19/11/18

Categories	Time recorded (Hours)						Total Sum of Charge	Average Hourly Rate
	Partner	Manager	Senior Administrator	Administrator	Junior	Total Time		
GENERAL CASE ADMINISTRATION								
Case Planning	0.60	0.20			4.70	5.50	931.00	169.27
Maintenance of Records		0.60		0.10	0.10	0.80	207.00	258.75
Statutory Reporting		1.30			1.00	2.30	516.50	224.57
Non-formal app Work		0.50				0.50	152.50	305.00
INS Cashiering				0.10		0.10	10.00	100.00
Total	0.60	2.60		0.20	5.80	9.20	1,817.00	197.50
REALISATION OF ASSETS								
Total								
INVESTIGATIONS								
Investigating Antecedent Transactions		0.30				0.30	91.50	305.00
Total		0.30				0.30	91.50	305.00
CREDITORS								
Total								
CASE SPECIFIC MATTERS								
Case Specific Matters		0.10			1.00	1.10	150.50	136.82
Total		0.10			1.00	1.10	150.50	136.82
	0.60	3.00		0.20	6.80	10.60	2,059.00	194.25

PRACTICE FEE RECOVERY POLICY FOR HASLERS

Introduction

The insolvency legislation was changed in October 2015, with one or two exceptions, for insolvency appointments made from that time. This sheet explains how we intend to apply the alternative fee bases allowed by the legislation when acting as office holder in insolvency appointments. The legislation allows different fee bases to be used for different tasks within the same appointment. The fee basis, or combination of bases, set for a particular appointment is/are subject to approval, generally by a committee if one is appointed by the creditors, failing which the creditors in general meeting, or the Court.

Further information about creditors' rights can be obtained by visiting the creditors' information micro-site published by the Association of Business Recovery Professionals (R3) at <http://www.creditorinsolvencyguide.co.uk/>. Details about how an office holder's fees may be approved for each case type are available in a series of guides issued with Statement of Insolvency Practice 9 (SIP 9) and can be accessed at <http://www.haslers.com/services/insolvency/>. Alternatively a hard copy may be requested from Haslers, Old Station Road, Loughton, Essex IG10 4PL. Please note that we have provided further details in this policy document.

Once the basis of the office holder's remuneration has been approved, a periodic report will be provided to any committee and also to each creditor. The report will provide a breakdown of the remuneration drawn. If approval has been obtained for remuneration on a time costs basis, i.e. by reference to time properly spent by members of staff of the practice at our standard charge out rates, the time incurred will also be disclosed, whether drawn or not, together with the average, or "blended" rates of such costs. Under the legislation, any such report must disclose how creditors can seek further information and challenge the basis on which the fees are calculated and the level of fees drawn in the period of the report. Once the time to challenge the office holder's remuneration for the period reported on has elapsed, then that remuneration cannot subsequently be challenged.

Under some old legislation, which still applies for insolvency appointments commenced before 6 April 2010, there is no equivalent mechanism for fees to be challenged.

Time cost basis

When charging fees on a time costs basis we use charge out rates appropriate to the skills and experience of a member of staff and the work that they perform. This is combined with the amount of time that they work on each case, recorded in 6 minute units with supporting narrative to explain the work undertaken.

Chargeout Rates

Grade of staff	Current charge-out rate per hour, effective from 1 January 2018 £	Previous charge-out rate per hour, effective from 1 January 2017 £
Partner – appointment taker	375-510	375-510
Manager	285-320	285-320
Senior Administrator	195-250	195-250
Case Administrator	95-165	95-165
Cashier	100	100

Where necessary and appropriate, members of staff from other departments of the practice will undertake work on a case. They will be charged at their normal charge out rate for undertaking such work.

These charge-out rates charged are reviewed on 1 January each year and are adjusted to take account of inflation and the firm's overheads.

Time spent on casework is recorded directly to the relevant case using a computerised time recording system and the nature of the work undertaken is recorded at that time. The work is generally recorded under the following categories:

- Administration and Planning.
- Maintenance of records
- Investigations.
- Realisation of Assets.
- Creditors.
- Case specific matters.
- Statutory reporting.

In cases where we were appointed prior to 1 October 2015, most of our fees were recovered on a time costs basis and appropriate authority was obtained from the creditors or the committee as set down in the legislation. The legislation changed on 1 October 2015 and on new appointments we seek time costs for all categories of work

When we seek time costs approval we have to set out a fees estimate. That estimate acts as a cap on our time costs so that we cannot draw fees of more than the estimated time costs without further approval from those who approved our fees. When seeking approval for our fees, we will disclose the work that we intend to undertake, the hourly rates we intend to charge for each part of the work, and the time that we think each part of the work will take. We will summarise that information in an average or "blended" rate for all of the work being carried out within the estimate. We will also say whether we anticipate needing to seek approval to exceed the estimate and, if so, the reasons that we think that may be necessary.

The disclosure that we make should include sufficient information about the insolvency appointment to enable you to understand how the proposed fee reflects the complexity (or otherwise) of the case, any responsibility of an exceptional kind falling on the office holder, the effectiveness with which the office holder has carried out their functions, and the value and nature of the property with which the office holder has to deal.

If we subsequently need to seek authority to draw fees in excess of the estimate, we will say why we have exceeded, or are likely to exceed the estimate; any additional work undertaken, or proposed to be undertaken; the hourly rates proposed for each part of the work; and the time that the additional work is expected to take. As with the original estimate, we will say whether we anticipate needing further approval and, if so, why we think it may be necessary to seek further approval.

Members' voluntary liquidations and Voluntary Arrangements

The legislation changes that took effect from 1 October 2015 did not apply to members' voluntary liquidations (MVL), Company Voluntary Arrangements (CVA) or Individual Voluntary Arrangements (IVA). In MVLs, the company's members set the fee basis, often as a fixed fee. In CVAs and IVAs, the fee basis is set out in the proposals and creditors approve the fee basis when they approve the arrangement.

All bases

With the exception of Individual Voluntary Arrangements and Company Voluntary Arrangements which are VAT exempt, the officeholder's remuneration invoiced to the insolvent estate will be subject to VAT at the prevailing rate.

Agent's Costs

Charged at cost based upon the charge made by the Agent instructed, the term Agent includes:

- Solicitors/Legal Advisors
- Auctioneers/Valuers
- Accountants
- Quantity Surveyors
- Estate Agents
- Other Specialist Advisors

In new appointments made after 1 October 2015, the office holder will provide details of expenses to be incurred, or likely to be incurred, when seeking fee approval. When reporting to the committee and creditors during the course of the insolvency appointment the actual expenses incurred will be compared with the original estimate provided.

Disbursements

In accordance with SIP 9 the basis of disbursement allocation in respect of disbursements incurred by the Office Holder in connection with the administration of the estate must be fully disclosed to creditors. Disbursements are categorised as either Category 1 or Category 2.

Category 1 expenses are directly referable to an invoice from a third party, which is either in the name of the estate or Haslers; in the case of the latter, the invoice makes reference to, *and therefore can be directly attributed to, the estate. These disbursements are recoverable* in full from the estate without the prior approval of creditors either by a direct payment from the estate or, where the firm has made payment on behalf of the estate, by a recharge of the amount invoiced by the third party. Examples of category 1 disbursements are statutory advertising, external meeting room hire, external storage, specific bond insurance and Company search fees.

Category 2 expenses are incurred by the firm and recharged to the estate; they are not attributed to the estate by a third party invoice and/or they may include a profit element. It is not Haslers' policy to charge for such costs.

PROVISION OF SERVICES REGULATIONS SUMMARY SHEET FOR HASLERS

The following information is designed to draw the attention of interested parties to the information required to be disclosed by the Provision of Services Regulations 2009.

Licensing Body

Nicholas Nicholson and Dominic Dumville are licensed to act as Insolvency Practitioners in the United Kingdom by the Institute of Chartered Accountants in England and Wales.

Nicholas Nicholson is a Member of the Insolvency Practitioners Association. Dominic Dumville is a Member of the Association of Chartered Certified Accountants.

Haslers is also a member of the ICAEW, Institute of Chartered Accountants in England and Wales.

Rules Governing Actions

All IPs are bound by the rules of their professional body, including any that relate specifically to insolvency. The rules of the professional body that licences Haslers can be found at <http://www.icaew.com/en/membership/regulations-standards-and-guidance/insolvency/insolvency-regulations-and-guidance>. In addition, IPs are bound by the Statements of Insolvency Practice (SIPs), details of which can be found at <https://www.r3.org.uk/what-we-do/publications/professional/statements-of-insolvency-practice>.

Ethics

All IPs are required to comply with the Insolvency Code of Ethics and a copy of the Code can be found at <http://www.icaew.com/en/technical/insolvency/insolvency-regulations-and-standards>.

Complaints

At Haslers we always strive to provide a professional and efficient service. However, we recognise that it is in the nature of insolvency proceedings for disputes to arise from time to time. As such, should you have any comments or complaints regarding the administration of a particular case then in the first instance you should contact the IP acting as office holder.

If you consider that the IP has not dealt with your comments or complaint appropriately you should then put details of your concerns in writing to our complaints officer Jon O'Shea, Haslers, Old Station Road, Loughton, Essex IG10 4PL. This will then formally invoke our complaints procedure and we will endeavour to deal with your complaint under the supervision of a senior partner unconnected with the appointment.

Most disputes can be resolved amicably either through the provision of further information or following negotiations. However, in the event that you have exhausted our complaints procedure and you are not satisfied that your complaint has been resolved or dealt with appropriately, you may complain to the regulatory body that licences the insolvency practitioner concerned. Any such complaints should be addressed to The Insolvency Service, IP Complaints, 3rd Floor, 1 City Walk, Leeds, LS11 9DA, and you can make a submission using an

on-line form available at www.gov.uk/complain-about-insolvency-practitioner; or you can email insolvency.enquiryline@insolvency.gsi.gov.uk; or you may phone 0300 678 0015. Information on the call charges that apply is available at <https://www.gov.uk/call-charges>.

Professional Indemnity Insurance

Haslers' Professional Indemnity Insurance is provided by Axis Speciality SE, of Willis Limited, 51 Lime Street, London EC3M 7DQ. This professional indemnity insurance provides worldwide coverage.

VAT

Haslers is registered for VAT under registration no. 978 0506 90.

Bribery Act 2010

Haslers is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on Haslers' behalf is responsible for maintaining our reputation and for conducting company business honestly and professionally.

Haslers take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

Haslers requires all those who are associated with it to observe the highest standards of impartiality, integrity and objectivity.

Haslers prohibits anyone acting on its behalf from:

- bribing another person. A bribe includes the offering, promising or giving of any financial or other type of advantage;
- accepting a bribe. This includes requesting, agreeing to receive or accepting any financial, or another kind of advantage;
- *bribing a foreign public official; and*
- condoning the offering or acceptance of bribes.

Haslers will:

- avoid doing business with others who do not accept our values and who may harm our reputation;
- maintain processes, procedures and records that limit the risk of direct or indirect bribery;
- promote awareness of this policy amongst its staff, those acting on its behalf and entities with which it has any commercial dealings;
- investigate all instances of alleged bribery, and will assist the police, and other authorities when appropriate, in any resultant prosecutions. In addition, disciplinary action will be considered against individual members of staff;
- review this policy regularly and update it when necessary.