Preventing the Facilitation of Tax Evasion under the Criminal Finances Act Code of Conduct

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Summary

This Code of Conduct ("Code") summarises the procedures of Tifo Limited ("Tifo") to ensure all Tifo associated persons, including employees and those acting on our behalf, do not facilitate tax evasion. It is based around the six guiding principles of:

- risk assessment,
- proportionality or risk-based prevention procedures,
- top level commitment,
- due diligence,
- communications and
- monitoring and review.

Statement

Tax evasion, tax fraud and attempts to facilitate such actions are antithetical to the ethos of Tifo. Tifo is committed to a zero-tolerance policy for tax evasion, and we are committed to a dedicated programme to counter the risk of any employee, contractor, business partner or representative of our company engaging in the criminal facilitation of tax evasion.

We expect everyone who works with and for Tifo to fully comply with their tax obligations. We will not tolerate, permit or allow any person associated with us to engage in the facilitation of tax evasion or tax fraud by any of our customers, suppliers, agencies, business partners, contractors or employees.

Accountability & Governance

The board of our company has approved this Code and our commitment to zero tolerance of tax evasion or its facilitation. The Legal Director is responsible for monitoring compliance with this Code and is supported by the HR Director and Head of Regulatory Compliance.

Employee responsibilities

Our code of conduct sets the standards of behaviour we expect all employees to adhere to. Our employees have a responsibility to take reasonable action to prevent harm to Tifo and we hold our employees accountable for their actions and omissions. Any actions that breach the Criminal Finances Act 2017 and the tax laws of where we operate brings harm to Tifo, both financial and reputational and will not be tolerated.

You are responsible for properly following Tifo's policies and procedures. These ensure that all taxes are properly paid. If you are ever asked by anyone either inside or outside our company to go outside our standard procedures, this should be reported without delay, as someone may be attempting to evade tax.

Any employee who has any concerns relating to any potential breach of this Code our Anti-Facilitation of Tax Evasion Policy must immediately follow our whistleblowing policy and report the matter without delay.

Our whistleblowing policy can be accessed:

- **By internal employees,** on CIPHR or P:\Policies & Forms\Internal Policies\Protected Disclosure.
- **By umbrella employees,** within our Employment Handbook on our online portal, or a copy can be provided on request by our Contractor Care team (0161 929 6000).

Training & communication

All employees must ensure they have the appropriate level of knowledge regarding tax evasion for their specific roles. All employees must take into account tax evasion-focused communications from senior management and be aware of the latest information the company may share regarding prevention of tax evasion.

Our risk assessment

Our risk assessment covers the categories of business operations we are involved in where there is a risk of tax evasion.

Our clients and contractors

Tifo is committed to the following principles:

- Our relationship with our clients is built on honesty, integrity, mutual trust and a commitment to professionalism.
- Our clients expect us to give the best possible advice and work in their best possible interest.
- Tax evasion is antithetical to who we are as a company and goes against our dedication to professionalism in our business.
- We firmly believe that any action which would breach tax laws or the Criminal Finances Act is not in the best interest of our clients.
- We endeavour to ensure that all advice we give to our clients on tax matters is consistent with the law and with HMRC guidance.
- Neither our company nor any person associated with our business will give advice to a client that would result in a breach of UK tax laws and guidance and the Criminal Finances Act, either for Tifo or our client.
- We do not condone or support tax evasion and we will not facilitate, give advice or in any way assist our clients to commit tax evasion offences.
- We will not support or work with clients who seek to criminally evade taxes, wherever in the world the tax is owed.

Our commitment

Tifo is committed to the following principles:

- Our business is carried out fairly, honestly, and openly in every part of our work.
- Our values, which include integrity, inform everything we do.
- We will never sell any product or service where we know or suspect that any aspect of the transaction is being misused, abused or otherwise corrupted for the purposes of tax evasion.
- We will never buy any product or service from any supplier where it is known or suspected that any aspect of the transaction is being misused, abused or otherwise corrupted for the purposes of tax evasion.
- We will immediately terminate any agreement or business relationship as soon as our company learns of or suspects tax evasion may be taking place.
- We will not progress any business opportunity where there is any suspicion that any aspect of it may involve tax evasion.

- We will not do business with others who do not also hold to at least the same standard of preventing tax evasion.
- Our company will regularly monitor and review this Code.
- Any employee found in breach of this Code will be subject to disciplinary action.
- We will not tolerate any contractor, off-payroll worker, business partner, representative or other third party associated with us failing to uphold this Code.
- No employee will suffer demotion, penalty, or any other adverse action for reporting any breach of this Code or from refusing to carry out an action which may lead to a breach of this Code.

Summary of key contacts

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