

This code of conduct summarises the procedures of SRL Accountancy and Payroll Services Ltd (SRL Ltd) and its subsidiaries to ensure all SRL Ltd associated persons, including employees and those acting on our behalf, do not facilitate tax evasion.

## **Statement**

Tax evasion, tax fraud and attempts to facilitate such actions are antithetical to the ethos of SRL Ltd. These crimes cheat the government out of revenue it needs to create the conditions for our business to flourish. It amounts to little more than stealing from our customers and from ourselves. SRL Ltd is committed to no tolerance 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 our company 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, business partners, contractors or employees anywhere in the world.

SRL Ltd is committed to complying in full with the tax laws everywhere we operate, and we choose to do this by respecting not only the letter of the law, but the spirit of the underlying tax policy intent. We aim to pay the right amount of tax at the right time, on all the eligible profits we make.

We believe in paying our fair share, and that everyone working with us should too.

## **Accountability and governance**

The Company Directors have approved this policy and our commitment to no tolerance of tax evasion or its facilitation.

## **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 SRL Ltd and we hold our employees accountable for their actions and omissions. Any actions that breach the Criminal Finances Act and the tax laws of wherever we operate brings harm to SRL Ltd and will not be tolerated.

You are responsible for properly following SRL Ltd policies and procedures. These should generally 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 policy must immediately report the matter to the Practice Manager for investigation.

## **Training and communication**

All employees must familiarise themselves with our prevention of tax evasion training and ensure they have the appropriate level of knowledge for their specific roles. All employees must take into account tax evasion-focused communications from senior management and be aware of the latest internal information 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.

High risk areas for our business include:

- Accounts payable and receivable
- Payment to contractors

- Payroll services
- Client demographic

#### Accounts payable and receivable

- Ensure correct procedures are followed.
- Do not process off-system invoices.
- Ensure all invoices have the correct VAT coding.
- Only contract with businesses which have good reputations.
- Ensure all information on an invoice is correct and as expected.
- Have the full contact details of the supplier and ensure it matches to where the payment is being made.
- Specify that VAT and other sales taxes must be added to invoices and have written reasons why such added taxes are not required.
- Do not pay suppliers in cash. If cash payments must be made, ensure they are properly invoiced and a receipt is supplied.
- Deny all requests to change the entity to be billed by the firm in circumstances where the firm did not provide advice or services to such entity.

#### Contractors / Suppliers

- Any wage payments outside of payroll must be expressly approved.
- Where tax is required to be deducted at the source this must be done.
- Payments to contractors should only be made in strict accordance with company policies.
- Cash payments should not be made. If they are, invoices and receipts must be present.
- Any tax related withholdings must be deducted and recorded.
- Payments without deductions should only be made if there is a reasonable expectation that the recipient will meet their tax obligations.
- Suppliers must show their commitment to the Criminal Finances Act 2017.
- The firm will only engage with associated persons whom they believe are unlikely to be engaged in the facilitation of tax evasion.

#### Payroll services

- Payroll processing regardless of the frequency for the client will be done in adherence to current legislation.
- All tax deductible at source will be handled according to HMRC and DWP guidelines.
- We will inform our clients of all PAYE liabilities and RTI submissions will be made accordingly.
- Clients are to advise us of any additional income streams which may affect their tax liabilities.
- SRL Ltd do not conduct right to work checks on behalf of the clients and are purely processing the data received in good faith, on the understanding that the necessary checks have been undertaken by the employer.

#### Client demographic

- Ensure that there is no engagement in none face-to-face business relationships.
- Unusually large or complex transactions should be examined as far as reasonably possible.
- Payments will not be accepted from unknown or un-associated third parties.
- Anti-Money Laundering Checks will be undertaken by SRL Ltd.
- The firm will not liaise with clients who request undue levels of secrecy within a transaction.
- The firm will not engage with clients where there is an unwillingness to provide the identity of the ultimate owner or controller.

## Key factors which may increase risk include:

- Cash transactions and cash intensive businesses
- Transactions in certain regions of the world:
  - those identified by credible sources as not having adequate Anti-Money Laundering and Counter-Terrorism Financing approaches
  - those countries subject to embargoes, sanctions or similar measures

## Our clients

SRL Ltd 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 every fibre of 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.
- The advice we give our clients we would give to ourselves and we endeavour to ensure all advice we give 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 the Criminal Finances Act, either for SRL Ltd 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

SRL Ltd is committed to the following principles:

- Our business is carried out fairly, honestly, and openly in every part of our work.
- Our values 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 policy.
- Any employee found in breach of this policy will be subject to disciplinary action.
- We will not tolerate any contractor, business partner, representative or other third party associated with us failing to uphold this policy.
- No employee will suffer demotion, penalty, or any other adverse action for reporting any breach of this policy or from refusing to carry out an action which may lead to a breach of this policy.