

## Overview

Tax Systems is committed to complying with the **Bribery Act 2010** in its business activities in the UK. Under this act, a bribe is defined as a financial or other type of advantage that is offered or requested with the:

- Intention of inducing or rewarding improper performance of a function or activity; or
- Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any other activity performed throughout a person's employment. This is where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with their position of trust. Failure to comply with this act is considered an illegal activity.

A criminal offence will be committed under the **Bribery Act 2010** if:

- You as an employee or associated person acting for, or on behalf of, the company offers, promises, gives, requests, receives or agrees to receive bribes; or
- You as an employee or associated person acting for, or on behalf of, the company offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of your duties (where local law does not permit or require such influence).

## Policy Details

This policy applies to all employees, temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of Tax Systems. We are all responsible for maintaining the highest standards of business conduct. Any breach of this policy could lead to disciplinary action, and there may be contractual and criminal ramifications for the individual concerned.

Tax Systems may also face criminal liability for unlawful actions taken by its employees or associated persons under the **Bribery Act 2010**. It is imperative that everyone therefore familiarise themselves and complies with this policy, including any future updates that may be issued from time to time.

Not knowing is not a defence, so please ensure you clarify any questions you may have with your manager or another member of the leadership team, as a priority.

Tax Systems prohibits from the offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party or a private person or company. This is regardless of whether situated in the UK or overseas.

The bribe might be made to ensure that a person or company improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for the company. This may occur either in efforts of obtaining and maintaining company business or to gain a personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance. This, for example, may be through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

Specifically, you must not:

- give or offer any payment, gift, hospitality or other benefit, in the expectation that a business advantage will be received in return, or to reward any business received;
- accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

## *Record Keeping*

You are required to take particular care to ensure that all company records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

Tax Systems keeps detailed and accurate financial records and have the appropriate internal controls in place to act as evidence for all payments made.

## *Gifts and hospitality*

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret.

Gifts must be given in our name, not your name.

Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners. If you are invited to a corporate hospitality event or receive gifts of an amount £50 and over, this must be pre-approved by your manager and department director and recorded in the gifts and hospitality register.

## *Reporting suspected bribery*

We depend on everyone to ensure that the highest standards of ethical conduct are maintained in all its business dealings. You are requested to assist and to remain vigilant in preventing, detecting and reporting bribery.

You are encouraged to report any concerns that you may have to your manager as soon as possible. Issues that should be reported include:

- Any suspected or actual attempts at bribery;
- Concerns that others may be being bribed; or
- Concerns that others may be bribing third parties, such as clients or government officials.
- Any reports of suspected bribery will be thoroughly and promptly investigated in the strictest confidence. You will be required to assist in any investigation into possible or suspected bribery.
- If you report instances of bribery in good faith it will be supported by us. We will ensure that you are not subjected to detrimental treatment consequentially to your actions. Any instances of detrimental treatment by a fellow employee because of a report will be treated as a disciplinary offence.
- An instruction to cover up wrongdoing is in itself could constitute a disciplinary offence. You should not agree to ignore any concerns you may have. You should report the matter to the either a member of the Legal team or a member of the People Team via email: [HR@taxsystems.com](mailto:HR@taxsystems.com).

## *Action by Tax Systems*

- We will fully investigate any instances of alleged or suspected bribery. If you are suspected of bribery, you may be suspended from your duties while the investigation is being carried out. Disciplinary action may be taken as a result in accordance with our disciplinary policy.
- Proven allegations may result in a finding of gross misconduct and immediate dismissal. We may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of Tax Systems who are found to have breached this policy. We may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions and the Police. All necessary will be provided to the relevant authorities for investigation and/or prosecution.