

SAXON WEALD

ANTI-CORRUPTION POLICY



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1.0 Introduction and aim

- 1.1 Saxon Weald is committed to the prevention and deterrence of all forms of corruption. We have established robust standards, procedures and controls to minimise the risk of corruption in its various forms.
- 1.2 Our aim is to be diligent and proactive in recognising corrupt activities and reducing opportunities for them to occur; along with being prompt to fully investigate and take appropriate and effective action in the event that suspected cases are brought to our attention.
- 1.3 This policy sets out Saxon Weald's principles for and approach towards corruption. It is underpinned by our corporate values and intends to ensure probity, transparency and accountability in all our business interests and activities.
- 1.4 This policy applies to all persons working for us or on our behalf in any capacity, including Board members, employees, officers, involved residents, temporary workers, consultants, contractors, suppliers, agents, volunteers and any other subsidiary, individual or organisation acting for, or on behalf of, Saxon Weald (collectively, "**associated persons**" or "**you**").

2.0 Policy Details

- 2.1 For the purposes of this policy, the term "**corruption**" includes abuse of power, attempted and suspected or alleged bribery, deception, embezzlement, extortion, fraud/false representation, serious misuse of funds, money laundering, serious undisclosed conflict of interest, tax evasion (and the facilitation of tax evasion) and theft.
- 2.2 In most cases, a majority of these activities will normally constitute criminal offences, although the precise definition of the offence may differ.
- 2.3 All associated persons are prohibited being involved in any form of corruption although some are more relevant to the business of Saxon Weald therefore we have included further detail on such activities in the Appendices. Saxon Weald's rules relating to the following forms of corruption are included in the Appendices and are incorporated into this policy:

- Appendix 1: Bribery;
- Appendix 2: Money laundering; and
- Appendix 3: Tax evasion (and the facilitation of tax evasion).

3.0 Background

3.1 This policy was established to amalgamate Saxon Weald's policies for bribery prevention, fraud and hospitality and gifts into a single, clear and consistent document.

3.2 The statutory, regulatory and corporate requirements relating to corruption and therefore applicable to this policy include:

3.2.1 Legislation

- Anti-Money Laundering Act 2018
- Bribery Act 2010
- Computer Misuse Act 1990
- Criminal Finance Act 2017
- Fraud Act 2006
- Global Anti-Corruption Sanctions Regulations 2021
- Housing and Regeneration Act 2008 (S122)
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
- Money Laundering and Terrorist Financing (Amendment) Regulations 2019 (MLR 2019)
- Modern Slavery Act 2015
- Prevention of Social Housing Fraud Act 2013
- Prevention of Social Housing Fraud (Power to Require Information) (England) Regulations 2014
- Proceeds of Crime Act (POCA) 2002
- Serious Crime Act 2015

3.2.2 Regulatory requirements

- The Regulator of Social Housing's (RSH) Governance and Financial Viability Standard

3.2.3 Internal controls and related documents

- Anti-Slavery and Human Trafficking Statement
- NHF Code of Conduct (2022)
- Corporate Risk Register (RM2224, RM2240 and RM2251)
- Disciplinary Procedure
- Equality, diversity and inclusion Policy
- Financial Regulations
- Fraud Response Plan
- Internal financial processes and controls in relation to income, purchases, payments, property and investments
- Our Rules and code of governance
- Procurement procedures and requirements for consultants, suppliers, contractors and agents to have appropriate measures in place
- Risk Appraisal Procedure

- Schemes of delegation
- Standing Orders Relating to Contracts
- Standing Orders and Terms of Reference
- Whistleblowing Policy

The above internal controls and documents are reviewed regularly.

3.2.4 Risk register reference

- Corrupt activity is recognised as an operational risk in the Corporate Risk Register: RM2240 – Fraud, theft, deception or serious conflict of interest involving staff, Board members, customers, contractors or third parties. Operational and strategic risks are recorded and updated.

3.2.5 Supporting guidance and best practice

- The Financial Conduct Authority (FCA's) document "Financial Crime – A Guide for Firms"
- The Ministry of Justice "Bribery Act 2010 Guidance"
- The National Housing Federation (NHF) Guidance on Anti-Money Laundering – How it affects members
- The National Housing Federation (NHF) Code of Conduct 2022

3.3 Part I of Schedule I of the 1996 Housing Act is more restrictive than Section 122 of the Housing and Regeneration Act 2008, with regard to limits on benefits and payments to Board members, staff and their families. Whilst Schedule I has been repealed, Saxon Weald continues to apply some of its requirements, as the limitations it prescribed remain sensible and effective as a control measure.

4.0 **Policy Statement**

4.1 Saxon Weald has a zero-tolerance approach to all forms of corruption. All associated persons have a duty to report suspicions of malpractice and corrupt activity, both in line with this policy and the NHF Code of Conduct (2022), which Saxon Weald has adopted. Saxon Weald aims to prevent corruption by meeting the relevant industry and statutory standards as well as having adequate compliance in place to mitigate any risks. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships and implementing and enforcing effective systems to counter corruption.

5.0 **Implementation**

5.1 In administering this policy, Saxon Weald will meet the relevant legislation and regulatory requirements, along with applying the principles contained in the Ministry of Justice's Bribery Act 2010 Guidance. This includes taking the following steps to prevent, recognise and respond to acts (or suspected acts) of corruption by any person or organisation working for or acting on our behalf, or with whom we intend to enter into a business arrangement:

- a) Ensure that the appropriate legislation is adhered to with regard to different types of corrupt activities identified in this policy.

- b) Have a senior level commitment to recognising and preventing corruption that filters throughout the organisation by way of effective communication and appropriate training for associated persons.
- c) Identify key risks for our business and produce a list of “red flags” for everyone to look out for. This will include considering risks associated with all new projects, activities and technology, as well as any significant change in process.
- d) Conduct regular (at least quarterly) risk assessments of all risks relating to all forms of corruption, together with management processes to mitigate those risks. Risk reports are to be provided to the Board and Audit & risk Committee three times a year.
- e) Ensure that robust procedures are available and promoted to enable the swift and comprehensive investigation into suspected or obvious acts of corruption, along with providing clear and appropriate options for managing different scenarios.
- f) Implement and promote a Whistleblowing Policy and Procedure so that suspected corruption can be reported without fear of victimisation.
- g) Encourage and provide opportunities for all parties covered by the scope of this policy to declare when a private interest interferes, competes or conflicts in any way with the interests of Saxon Weald, which makes it difficult for them to perform their duties objectively, fairly and in line with our corporate values.

6.0 Equality, diversity and inclusion

- 6.1 Equality, diversity and inclusion (EDI) affects all aspects of our business and, as such, its principles are integral to everything we do. As a landlord and employer, Saxon Weald aims to recognise and respond positively to people’s differences, while providing equality of opportunity in relation to the services and careers we provide and support.
- 6.2 This means that no person or group of people, either working for Saxon Weald or seeking housing, services, employment or contracts from us, will be treated less favourably because of their or their partner’s, family’s, friend’s or associated person’s protected characteristics, which are; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, gender and sexual orientation. This includes individuals either already serving on or applying to join our Board.
- 6.3 Avoiding, preventing and reporting actual, suspected or attempted forms of corruption is the responsibility of all parties referred to in this policy, as well Saxon Weald in general. This policy, therefore, applies to all individuals, irrespective of their protected characteristics and their position in Saxon Weald, or the company they work for if providing a service to Saxon Weald.

7.0 Monitoring and review

- 7.1 Weaknesses in the design and operation of systems and procedures can increase the risk of corrupt activity. This is especially true where individuals recognise the weaknesses and seek to exploit them. All systems must, therefore, incorporate efficient, effective and

well-documented controls. An effective control environment is reliant on the overall attitude, awareness and actions of managers towards internal controls.

- 7.2 The effective operation of internal controls is essential as defence against fraudulent or corrupt practices. It is the responsibility of managers at all levels to make sure these controls are operating effectively by test checking and verifying work processed by the systems, and the individuals, under their control.
- 7.3 The effectiveness of Saxon Weald's anti-corruption arrangements and systems will be reviewed as part of the internal audit process, with assurance reports provided to the Audit and Risk Committee.
- 7.4 The Risk Register, including assessment of the risk of corruption, will be reported to the Audit and Risk Committee and Board annually. Any new activity/change in the external environment will be assessed for the risk of corruption and appropriate controls put in place.
- 7.5 This policy will be reviewed every three years in line with Saxon Weald's policy review timetable, or in the interim period if any major legislative or regulatory changes require it.

8.0 Responsibilities

- 8.1 **Managers** – Managers must follow this policy, and have day-to-day responsibility for ensuring staff understand and comply with this policy, and are properly trained. They must report non-compliance and identify and provide any additional training required.
- 8.2 **The Board** – The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and those under our control comply with it. The Board also has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to Audit and Risk Committee. The Audit and Risk Committee must review this policy every three years, and review reports submitted to it in accordance with this policy. The Board must appoint an Money Laundering Reporting Officer (MLRO) and a deputy and ensure adequate controls are in place to manage and report financial crime.
- 8.3 **All associated persons** – A breach of this policy constitutes a serious contractual breach, which will be fully investigated and could result in disciplinary action and/or criminal proceedings.

Appendix I: Bribery

1.0 Definitions

1.1 For the purposes of this policy, the following definitions shall apply:

“Bribe” means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

“Bribery” is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

2.0 Prohibited acts

2.1 All associated persons covered under the scope of this policy are prohibited from accepting bribes. This includes, but is not limited to, the following activities:

- a) Giving, promising to give, or offering a payment, gift or hospitality with the expectation or hope that a business or personal advantage will be received; or to reward a business advantage that has already been gained. This includes the making and acceptance of facilitation payments in order to secure or expedite a business arrangement or process.
- b) Requesting, agreeing to receive and/or accepting a payment, gift or hospitality in order to gain a personal or business advantage, or where you know or suspect that it is offered with the expectation that it will achieve a business or service advantage for a third party.
- c) Accepting a payment of any kind from any person or organisation, other than legitimate payments made through Saxon Weald’s recognised systems for supplies, services or works associated with Saxon Weald’s business activities.
- d) Using, or attempting to use, your position to achieve personal gain from customers, suppliers, contractors, consultants and any other persons or bodies associated with Saxon Weald; unless agreed arrangements for member and staff benefits (e.g. discount schemes) from that body are already in place.
- e) Being knowingly involved in any activity that conflicts in any way with the interests of Saxon Weald, and which makes it difficult for you to deal with the matter objectively, fairly and in line with our corporate values; unless the conflict has been formally declared and approved by an Executive and/or the Board.
- f) Falsifying documentation to gain a business advantage, speed up a process or achieve personal gain.
- g) Coercing or allowing an individual/s or organisation to commit a corrupt activity.
- h) Threatening, intimidating or retaliating against an individual/s that has refused to participate in a corrupt activity or has raised concerns under this policy.

- i) Misusing Saxon Weald's funds or assets, including the unauthorised taking, selling and use of tools, goods and materials owned by Saxon Weald.
- j) Employing or procuring services, supplies or works from close family, friends or acquaintances, unless the conflict of interest has been formally declared and approved by the relevant person at Saxon Weald and the Procurement Procedure has been followed.
- k) Offering or accepting a gift or payment to, or from, government officials or representatives, or politicians or political parties to facilitate or speed up a routine or necessary procedure. Facilitation payments and kickbacks are strictly prohibited.
- l) Engaging in any other activity that might result in a breach of this policy.

2.2 Saxon Weald also prohibits political contributions of any kind in a Saxon Weald capacity. This includes: the contribution of Saxon Weald funds or assets for political purposes; encouraging employees to make any such contributions; or reimbursing employees for making such contributions.

3.0 Reporting

3.1 If any associated person is asked to make a payment on behalf of Saxon Weald, such associated person should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. If any payment is made on behalf of Saxon Weald, a receipt detailing the reason for the payment should always be sought.

3.2 All suspected and obvious acts of corruption must be reported to a senior manager as soon as they become apparent. Any queries as to whether a particular act constitutes corruption, you should raise it with a senior manager who will provide guidance. Senior managers have a continuing duty to deter, detect and respond to corrupt activities in their business area. Senior managers must, in turn, report any such issues in accordance this policy.

3.3 Alternatively, where a person feels uncomfortable reporting suspected or obvious acts of corruption or unusual activity; or if the person they are reporting is a senior manager or Board member, they are encouraged to follow the Whistleblowing Policy and Procedure, which protects their anonymity and will ensure that the matter is considered and investigated appropriately.

3.4 All reports of suspected bribery or corruption will be taken seriously and dealt with urgently, appropriately and in confidence.

4.0 Hospitality and gifts

4.1 Saxon Weald allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of: establishing or maintaining good business relationships; improving or maintaining our image/reputation; or marketing or presenting our products and services effectively. Note that prior to providing any hospitality or entertainment, you must be authorised to do so by the relevant person at Saxon Weald.

4.2 The following will apply with regard to the receipt of hospitality and gifts:

- a) All offers or receipts of hospitality to the sum of £50 or more, per person, must be reported and recorded in the electronic register which is accessible on SharePoint. Training on SharePoint will be provided if required.
- b) Prior authority must be obtained before accepting hospitality with a value in excess of £100, this includes where an individual has any uncertainty about the appropriateness of any hospitality offered.
- c) Any hospitality accepted must be reasonable and not give others the opportunity to impute improper influence. It would be acceptable, for example, to accept:
 - i) Meals provided to allow associated persons to discuss business.
 - ii) An invitation to attend a professional body's dinner or function.
 - iii) An invitation to join other guests at a company's sponsored event (e.g. an awards dinner or sporting engagement).
 - iv) It is unacceptable to receive things such as paid holidays, hotel or theatre tickets, or the use of property or hotel suites provided by a third party. Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift.
 - v) The acceptance of cash gifts is not permitted under any circumstances. However, gifts of nominal value, such as promotional goods (for example calendars, diaries, etc) may be accepted by individuals.
 - vi) Gifts with a value in excess of £20 must not be accepted personally by Associated Persons. This applies whether such gifts are from individual customers or external organisations.
 - vii) Gifts from groups of tenants (e.g. in a retirement scheme) which together add to over £150 cannot be accepted. However, staff leaving the employment of the company are allowed to accept individual gifts from tenants providing they are each worth under £20 or a collective gift that is under £200; although, the staff member concerned is still required to record the gift in the hospitality and gifts register.
 - viii) Associated persons and/or their close relatives are not permitted to be executors of unrelated tenants' wills or receive in a will gifts of more than £100 whether in cash or goods.
 - ix) Associated Persons are not permitted to act as witness signatories to tenants' wills.
 - x) Gifts given secretly must not be accepted.
- d) More expensive gifts (e.g. those provided by suppliers at Christmas time) should be dealt with in the most appropriate of the following ways:
 - i) Donated to charitable causes with the agreement of the donor;
 - ii) Ruffled or auctioned with the proceeds going to charity (e.g. Christmas gifts should be entered into the staff Christmas raffle);

- iii) Retained in Saxon Weald's premises; or
 - iv) Declined politely.
- e) You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expense claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for the expenditure.

Appendix 2: Money laundering

1.0 Definitions

1.1 For the purposes of this policy, the following definitions shall apply:

“Money laundering” is the process by which the proceeds of crime are converted into assets that appear to have a legitimate origin, so that they can be retained or used to fund further crime. The Proceeds of Crime Act (POCA) 2002 states that a money laundering offence is committed if a person:

- a) Conceals, disguises, converts or transfers criminal property, or removes criminal property from England and Wales, or from Scotland or from Northern Ireland (section 327); or
- b) Enters into or becomes concerned in an arrangement which they know or suspect facilitates (by whatever means) the acquisition, retention, use or control of criminal property by or on behalf of another person (section 328); or
- c) Acquires, uses or has possession of criminal property except where adequate consideration was given for the property (section 329).

2.0 Prohibited acts

2.1 Money laundering is strictly prohibited. Saxon Weald, with the support and co-operation of you, during the course of business will:

- a) Ensure that due diligence is undertaken prior to entering into any contract, arrangement, or relationship with a potential supplier of services, supplies or works and that any such contract, arrangement or relationship is entered into in accordance with our procurement procedure.
- b) Ensure arrangements with suppliers, contractors, consultants, agents etc are in writing and include reference to corruption in contract specifications, where appropriate; ensuring that any organisation wishing to work with Saxon Weald has an equally robust policy and approach in place, which they can evidence is implemented effectively.
- c) Carry out appropriate Anti-Money Laundering (AML) checks, where necessary, to verify the identity of third parties carrying out financial transactions with Saxon Weald.
- d) Provide appropriate training for associated persons in recognising, reporting and managing suspected corrupt activities. Such training to be included as part of new staff induction and refreshed every two years or more frequently where necessary, to take account of new/current threats of financial crime, which shall be report on to the Audit and Risk Committee annually.
- e) Report significant instances of fraud, along with the actions taken, to the Regulator of Social Housing at the earliest opportunity.
- f) Ensure we are registered with HM Revenue and Customs for our estate agency work.

- g) Maintain a Money Laundering Reporting Officer (“MLRO”), who is proposed to be the the Assistant Director – Finance and the deputy as the Senior Financial Business Manager.
- h) Ensure suspicious activity is reported to the MLRO (or the Deputy MLRO where appropriate) as soon as possible, without tipping off. To include ensuring staff know how to recognise and report suspicious activity; when, what and in respect of whom anti-money laundering checks are required; and how to identify politically exposed persons.
- i) Screen staff, including carrying out Disclosure and Barring Service (DBS) checks and/or ensuring they are certified, where appropriate.
- j) Retain documents in accordance with both the National Housing Federation’s and Saxon Weald’s document retention schedules.
- k) Ensure products and services are designed to best meet customer needs, with systems and controls in place to monitor this, and to identify and mitigate risks.
- l) Ensure staff treat customers fairly at all times.
- m) Ensure no consumer credit activity is undertaken that would require Saxon Weald to be registered with the Financial Conduct Authority (FCA). However, if this should become necessary appropriate registration with the FCA is sought.
- n) Audit our compliance on an annual basis and ensure that appropriate crime insurance cover is in place.
- o) Keep appropriate records.

3.0 Reporting

- 3.1 The MLRO will be responsible for receiving and investigating suspicious activity reports, and notifying the National Crime Agency where appropriate. The MLRO will liaise with anyone making a suspicious activity report and let them know what steps they need to take (particularly pending a response from the National Crime Agency). The MLRO will also be responsible for ensuring due diligence is carried out on associated persons. The MLRO will report annually to the Audit and Risk Committee.

Appendix 3: Tax evasion (and the facilitation of tax evasion)

1.0 Definitions

1.1 For the purposes of this policy, the following definitions shall apply:

"Tax evasion" means the offence of cheating the public revenue or fraudulently evading UK tax, and is a criminal offence. The offence requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent.

"Foreign tax evasion" means evading tax in a foreign country, provided that conduct is an offence in that country and would be a criminal offence if committed in the UK. As with tax evasion, the element of fraud means there must be deliberate action, or omission with dishonest intent.

"Tax evasion facilitation" means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, or aiding, abetting, counselling or procuring the commission of that offence. Tax evasion facilitation is a criminal offence, where it is done deliberately and dishonestly.

2.0 Offence details

2.1 Under the Criminal Finances Act 2017, a separate criminal offence is automatically committed by a corporate entity or partnership where the tax evasion is facilitated by a person acting in the capacity of an "associated person" to that body. For the offence to be made out, the associated person must deliberately and dishonestly take action to facilitate the tax evasion by the taxpayer. If the associated person accidentally, ignorantly, or negligently facilitates the tax evasion, then the corporate offence will not have been committed. The company does not have to have deliberately or dishonestly facilitated the tax evasion itself; the fact that the associated person has done so creates the liability for the company.

2.2 Tax evasion is not the same as tax avoidance or tax planning. Tax evasion involves deliberate and dishonest conduct. Tax avoidance is not illegal and involves taking steps, within the law, to minimise tax payable (or maximise tax reliefs).

2.3 In this policy, all references to 'tax' include national insurance contributions.

3.0 Prohibited acts

3.1 It is not acceptable for you (or someone on your behalf) to:

- a) Engage in any form of facilitating tax evasion or foreign tax evasion;
- b) Aid, abet, counsel or procure the commission of a tax evasion offence or foreign tax evasion offence by another person;

- c) Fail to promptly report any request or demand from any third party to facilitate the fraudulent evasion of tax (whether UK tax or tax in a foreign country), or any suspected fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, in accordance with this policy;
- d) Engage in any other activity that might lead to a breach of this policy; or
- e) Threaten or retaliate against another individual who has refused to commit a tax evasion offence or a foreign tax evasion offence or who has raised concerns under this policy.

4.0 Reporting

4.1 The prevention, detection and reporting of tax evasion and foreign tax evasion are the responsibility of all associated persons. You are required to avoid any activity that might lead to, or suggest, a breach of this policy with respect to money laundering.

4.2 You must notify the MLRO or Deputy MLRO (or if the allegation concerns either of these two positions, then the Executive Director – Resources or Chief Executive) as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if an employee or supplier asks to be paid into an offshore bank account without good reason, or a supplier asks to be paid in cash, indicating that the payment will not be subject to VAT. Further "red flags" that may indicate potential tax evasion or foreign tax evasion are set out in section 6.

4.3 How to raise a concern

- a) You are encouraged to raise concerns about any issue or suspicion of tax evasion or foreign tax evasion at the earliest possible stage.
- b) If you become aware of any fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person in the course of your work, or you are asked to assist another person in their fraudulent evasion of tax (whether directly or indirectly), or if you believe or suspect that any fraudulent evasion of tax has occurred or may occur, whether in respect to UK tax or tax in a foreign country, you must report it to the MLRO or Deputy MLRO (or if the allegation concerns either of these two positions then the Executive Director – Resources or Chief Executive) as soon as possible.
- c) If you are unsure about whether a particular act constitutes tax evasion or foreign tax evasion, raise it the MLRO or Deputy MLRO (or if the allegation concerns either of these two positions, then to the Executive Director – Resources or Chief Executive) as soon as possible. The corporate offence is only committed where you deliberately and dishonestly take action to facilitate the tax evasion or foreign tax evasion. If you do not take that action, then the offence is not made out. However, a deliberate failure to report suspected tax evasion or foreign tax evasion, or ignoring suspicious activity, could amount to criminal facilitation of tax evasion.

5.0 Protection

- 5.1 Individuals who raise concerns or report another's wrongdoing are sometimes worried about facing possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 5.2 We are committed to ensuring no one suffers any detrimental treatment as a result of:
- a) Refusing to take part in, be concerned in or facilitate tax evasion or foreign tax evasion by another person;
 - b) Refusing to aid, abet, counsel or procure the commission of a tax evasion offence or a foreign tax evasion offence by another person; or
 - c) Reporting in good faith their suspicion that an actual or potential tax evasion offence or foreign tax evasion offence has taken place, or may take place in the future.
- 5.3 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any of this treatment, you should inform the Assistant Director – people (or if the allegation concerns the Assistant Director – People then the Executive Director – Resources or Chief Executive) immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which is available on SharePoint.
- 5.4 The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns related to tax evasion or foreign tax evasion. The list is not intended to be exhaustive and is for illustrative purposes only.

6.0 Red flags

- 6.1 If you encounter any of these red flags while working for us, you must report them promptly the MLRO or Deputy MLRO (or if the allegation concerns either of these two positions the Executive Director – Resources or Chief Executive):
- a) You become aware, in the course of your work, that a third party has:
 - i) made or intends to make a false statement relating to tax;
 - ii) failed to disclose income or gains to, or to register with, HMRC (or the equivalent authority in any relevant non-UK jurisdiction);
 - iii) delivered or intends to deliver a false document relating to tax; or
 - iv) set up or intends to set up a structure to try to hide income, gains or assets from a tax authority.
 - b) You become aware, in the course of your work, that a third party has deliberately failed to register for VAT (or the equivalent tax in any relevant non-UK jurisdiction) or failed to account for VAT;

- c) A third party requests payment in cash or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- d) You become aware, in the course of your work, that a third party working for us as an employee asks to be treated as a self-employed contractor, but without any material changes to their working conditions;
- e) A supplier or other subcontractor is paid gross when they should have been paid net, under a scheme such as the Construction Industry Scheme;
- f) A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- g) A third party to whom we have provided services requests that their invoice is addressed to a different entity, where we did not provide services to that entity directly;
- h) A third party to whom we have provided services asks us to change the description of services rendered on an invoice in a way that seems designed to obscure the nature of the services provided;
- i) You receive an invoice from a third party that appears to be non-standard or customised;
- j) A third party insists on the use of side letters or refuses to put terms agreed in writing or asks for contracts or other documentation to be backdated;
- k) You notice that we have been invoiced for a commission or fee payment that appears too large or too small, given the service stated to have been provided;
- l) A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
- m) A tenant seeks to pay rent, service charges, and/or arrears in cash;
- n) A shared owner or other leaseholder is seeking to sub-let their property in breach of restrictions in their lease;
- o) The purchase price of a property is adjusted so that some components are paid for separately – e.g. fixtures and fittings (particularly if the amount adjusted does not appear to relate to the value of those items);
- p) Source of funds and/or “know your client” checks reveal inconsistencies or matters of concern;
- q) A partner organisation/joint venture entity proposes a development structure that appears to facilitate the evasion of VAT or SLDT;
- r) Any other risk that might occur given the nature of Saxon Weald’s business.

Version	Amendment	By	Date
1.0	Amalgamation of the Bribery Prevention, Money Laundering, Fraud Policy, and Hospitality and Gifts Policy, into a single Anti-Corruption Policy.	John Adams	Nov 2022