



# Corporate Criminal Offence policy

Policy no. POL130



# Policy

## Purpose

The purpose of this policy is to communicate the group's approach to the Corporate Criminal Offence of the Failure to Prevent the Criminal Facilitation of Tax Evasion ("CCO").

A criminal offence is committed under this legislation where an associated person of Thames Water (such as an employee, contractor or agent) deliberately and dishonestly facilitates a taxpayer evading tax, and Thames Water has not put in place reasonable preventative procedures.

## Key principles

The following basic principles are applied by Thames Water:

- Ensuring that we have reasonable prevention procedures in place to prevent any person associated with Thames Water from facilitating tax evasion. Our key procedures comprise:
  - Obtaining assurances and warranties from suppliers that they have reasonable prevention procedures in place;
  - Providing training to our staff and being clear about the consequences if a person associated with Thames Water facilitates tax evasion;
  - Providing a pathway for reporting wrongdoing and providing protection for whistle-blowers;
  - Operating existing, and implementing new, procedures which reduce the opportunity for employees to facilitate tax evasion, and regularly reviewing these for effectiveness and improvement;
- Adopting a zero-tolerance attitude towards the criminal facilitation of tax evasion;
- Where internal investigations indicate a person associated with Thames Water has facilitated tax evasion, they will be reported to the authorities and Thames Water will fully support prosecution to the fullest extent of the law;
- Not to use the services of others who are unable to provide assurance that they have reasonable prevention procedures in place.

## Who this policy applies to

This policy applies to all persons associated with Thames Water, including for employees, contractors, agents, and any person acting on behalf of Thames Water.

## Responsibilities

- All persons associated with Thames Water are responsible for adhering to this policy
- All employees / contractors / business partners are responsible for not facilitating tax evasion of taxpayers
- Leadership / subject matter teams are responsible for ensuring Thames Water fulfils its key principles
- The Board is responsible for ensuring appropriate policies are in place and creating a corporate culture that supports compliance

## When to speak up

As an employee you commit to:

- Complying with this policy
- Reporting any concerns

If you have a concern about any issues relating to our Corporate Criminal Offence policy performance or management arrangements, or you have a question about this policy you can speak to the policy owner or any of the following:



## Useful references

External:

- Criminal Finances Act 2017, Corporate Criminal Offence of the Failure to Prevent the Criminal Facilitation of Tax Evasion

**Policy approved by the Audit, Risk & Reporting Committee (ARRC) and Policy Exec Sponsor, Chief Finance Officer (CFO), September 2020**