

# Procurement Newsletter

## February 2023

- [Financial Crime and Facilitating Tax Evasion](#)
- [What can suppliers do to ensure a CCO is not committed?](#)
- [What can suppliers do if they suspect Financial Crime or Tax Evasion?](#)
- [Additional Resources](#)



# Procurement Newsletter

We are the Post Office and there is no-one like us. From our travel and financial services, passports to postage, the Post Office network is serving communities across the UK. We have a network of more than 11,500 branches across the UK and every one of our branches is at the heart of its community.

We are introducing a series of quarterly newsletters to our Supplier partners to:

- Raise awareness of our values and the subjects that matter to us.
- Provide news, information and training that will help you to do business with us.
- Help you find opportunities to work with us as we grow and change for the future.

## Financial Crime and Facilitating Tax Evasion

Financial crime risks include areas such as fraud, anti-money laundering, counter-terrorist financing, and facilitation of criminal tax evasion. Facilitating tax evasion means deliberately and dishonestly cheating the public revenue or being knowingly involved in, or taking steps with a view to, the fraudulent evasion of a UK tax (such as income tax, VAT and National Insurance Contributions) or foreign tax.

Post Office Limited (Post Office) applies a zero-tolerance policy to criminal tax evasion and the criminal facilitation of criminal tax evasion. It is committed to preventing such facilitation within all parts of the business. If any associated person of Post Office (which includes suppliers) criminally helps or allows any other person to evade tax, not only does that associated person commit a criminal offence; it may also cause Post Office to do the same.

### What can suppliers do to ensure a CCO is not committed?

The Criminal Finance Act 2017 (CFA) introduced the concept of a Corporate Criminal Offence (CCO). If a business commits a CCO there are unlimited fines and penalties that HMRC can apply. This includes failure to prevent criminal facilitation of criminal tax evasion, as well as criminal tax evasion itself.

Under the CFA you are required to have implemented reasonable procedures (to prevent criminal facilitation of criminal tax evasion) within your business where required and ensure that all relevant staff/personnel understand them. This could include a policy, formal documentation of key processes and risks associated with them, regular risk assessments and annual awareness training. You must carry out monitoring and reviews of these processes and procedures on a regular basis to ensure you are up to date.

When you sign up as a supplier to Post Office through the Web3 portal we ask you to confirm that you have undertaken risk assessments for financial crime risks within your organisation.

Our Corporate Social Responsibility survey (see May 2021 Newsletter) also includes questions on the processes and controls in place within your organisation.

We would like to remind you that there is also a responsibility to inform your 'associated persons' of their responsibilities under the CFA. This includes not just your own direct employees, but also agents, suppliers, contractors/subcontractors or any other person or representative who performs services for or on behalf of your organisation or body, acting in that capacity.

Please ensure that your processes and communication to all associated persons acting for your organisation are sufficient to make them aware of the CFA Act and your expectations for their responsibilities and conduct.

### What can suppliers do if they suspect Financial Crime or Tax Evasion?

You are responsible for the prevention and detection of criminal tax evasion and criminal facilitation of criminal tax evasion in any part of your supply chain (including any other persons that perform services for or on behalf of Post Office).

You should notify Post Office as soon as possible if you believe or suspect that criminal tax evasion and/or criminal facilitation of criminal tax evasion has occurred, or may occur in the future, by telephoning Grapevine on 0845 603 4004.

You should raise any concerns you have about any issue or suspicion of criminal facilitation of criminal tax evasion in any parts of your business or supply chain at the earliest possible stage.

You should report it to us even if you are unsure about whether a particular act constitutes criminal tax evasion or criminal facilitation of criminal tax evasion.

Post Office aims to encourage openness and will support anyone who raises genuine concerns in good faith in relation to criminal tax evasion and/or criminal facilitation of criminal tax evasion, even if mistaken. Please read our Supplier Code of Conduct.

## Additional Resources

Guidance on the CFA 2017 - [https://corporate.postoffice.co.uk/media/yxslwyfr/guidance-criminal-finances-act-2017\\_0.pdf](https://corporate.postoffice.co.uk/media/yxslwyfr/guidance-criminal-finances-act-2017_0.pdf)

Supplier Code of Conduct - <https://corporate.postoffice.co.uk/media/jsokggex/supplier-code-of-conduct2022.pdf>

Government website - <https://www.gov.uk/government/collections/criminal-finances-act-2017>

Corporate Criminal Offences - <https://www.gov.uk/government/publications/corporate-offences-for-failing-to-prevent-criminal-facilitation-of-tax-evasion>

### Who do I contact for help?

Please read the guidance on our website <https://corporate.postoffice.co.uk/en/governance/our-suppliers/working-with-us/>



If you require any further advice please contact [procurement@postoffice.co.uk](mailto:procurement@postoffice.co.uk)