TCRM3360 - Which customers might expect to fit in risk-rating categories 1 to 4?

Rating 1	Rating 2	Rating 3	Rating 4
(Low)	(Moderate)	(Moderate to High)	(High)
All customers will be able to say the	Customers will be able to say one of the	Customers will be able to say one or more	Customers will be able to say one or more
following:-	following:-	of the following:-	of the following:-
I maintain an open and transparent	I want to get to low-risk and am working	I am sometimes non-cooperative in my	I am in the High-Risk Corporates
relationship with HMRC.	towards getting there. There are some	approach to tax compliance and/or fail to	Programme.
Lhave systems and processes which	aspects of my systems, tax governance or	engage openly and constructively with	My non cooperative approach to tay
I have systems and processes which deliver timely and accurate returns,	my approach to tax compliance which need to be addressed, but once these are	HMRC, which means I cannot always be relied on to get my taxes right.	My non-cooperative approach to tax compliance and/or unwillingness to
declarations, payments and claims.	resolved, I would expect to become low-	relied on to get my taxes right.	engage openly and constructively with
deciarations, payments and claims.	risk.	My systems and processes are not	HMRC means I cannot be relied on to get
I have sufficiently skilled and experienced		sufficiently robust that I can always be	my taxes right and the amounts of tax
resources in my tax teams.		expected to get my taxes right and the	potentially at risk are material and
·	I am not particularly concerned about	amounts of tax potentially at risk are	significant.
I only require HMRC assistance on the	being low-risk and recognise that there	material and significant.	
most complex issues and clearances;	are aspects of my systems, my tax		My structures and/or systems and
I routinely review my tax systems and	governance or my approach to tax	I seldom engage in tax avoidance schemes	processes are so labyrinthine or weak that
declarations and, if I identify any errors, I	compliance which may well prevent me	or boundary pushing as a leader, but I	I cannot be expected to get my taxes right
notify HMRC at the earliest opportunity	getting there. I am, however, keen to	regularly position myself as a follower to	and the amounts of tax potentially at risk
and take appropriate steps to remedy the	maintain a collaborative, open and	try and secure tax advantages.	are material and significant.
situation.	transparent working relationship with HMRC and, other than the occasional tax	I am not directly involved in illicit trades	My tax strategy makes me an outlier in
I have a clear tax strategy which is applied	dispute where HMRC and I might disagree	but I am not averse to profiting from them	terms of my approach to tax compliance. I
in practice to try and ensure the right tax	about the appropriate tax treatment, I am	and take little active interest in mitigating	am persistent in using creative tax
is paid at the right time.	striving to get all my taxes right.	illicit trades within my supply chain.	planning and/or tax avoidance schemes; I
lo para de uno rigine unior	samme to get an my takes right.	more trades triaini, sappi, siraini	regularly push boundaries to try and
I provide a complete worldwide group			secure tax advantages.
structure, if requested to do so by HMRC.			-
I am not involved in tax planning other			I am directly involved in illicit trades.
than that which supports genuine			
commercial activity and fully disclose the			
facts to HMRC where there is any			
uncertainty or disagreement.			
I am not directly involved with illicit trades			
and am active in mitigating illicit trades			
within my supply chain.			