



B Lab Statement on PKF Francis Clark LLP's B Corp Certification

B Lab's independent Standards Advisory Council has rendered the following decision and guidance regarding eligibility for B Corp Certification for companies providing tax advisory services:

"Companies in the tax advisory industry are eligible for B Corp Certification if they are able to confirm that their tax philosophy, used to provide services and recommendations to clients, aligns with the company specific principles listed in B Lab's framework, specifically, 1) the tax advice provided appropriately reflects the actual amount of income generated by the client over time; and, 2) the tax advice provided to a client for a jurisdiction appropriately reflects the actual operations of the client in that jurisdiction."

PKF Francis Clark LLP is required to disclose a summary of how it complies with the above requirements as a part of its B Corp Certification. For more information on the review process, please refer to B Lab's position statement on Companies that Provide Tax Advisory Services and B Corp Certification [here](#).

Summary of Company

PKF Francis Clark provides comprehensive tax advisory services that encompass both expert consultancy and compliance support. Its consultancy offerings include guidance on employee incentives, tax implications of business expansion and restructuring, business sales and acquisitions, and intergenerational wealth planning. On the compliance side, the firm prepares corporate tax returns for organisations and personal tax returns for individuals, as well as other statutory reporting requirements, such as trust 10-year charges, employer-related security returns, and capital gains reporting on UK property disposals. While tax return preparation is not strictly classified as tax advisory work, the firm includes it in its service disclosures to ensure complete transparency.

The company serves a diverse client base, including individuals, families, not-for-profit organisations, charities, trusts, owner-managed and family businesses, small and medium-sized enterprises (SMEs), larger enterprises, and UK subsidiaries of international businesses. For the fiscal year 2023/24, tax advisory services, including related tax return services accounted for 18% of the firm's total revenues.

Fees for tax advisory services are generally charged on a time and materials (T&M) basis. In certain engagements, fees may be structured on a contingent basis, with calculations agreed in advance with the client based on an approved outcome from His [Majesty's Revenue and Customs \(HRMC\)](#). In all cases, the firm ensures strict compliance with [Professional Conduct in Relation to Taxation \(PCRT\)](#) rules and regulations; it does not structure services or fees around



any tax savings achieved by the client, nor does it support planning that misrepresents or artificially reduces taxable income.

PKF Francis Clark LLP's Policies and Practices

In alignment with the requirements and principles stated in B Lab's position statement for companies that provide tax advisory services, PKF Francis Clark has a philosophy statement for the tax advice that they provide to their clients and their own engagement with governments and tax regulators, which has been shared with all their employees. The philosophy statement reads as follows:

"PKF Francis Clark LLP is proud of our status as a Certified B Corp. As part of that commitment and in recognition of the role that taxes play in contributing to a healthy society, we use our professional judgment to provide advice regarding tax positions with multiple potential interpretations that accurately reflects the income and operations of the client in each jurisdiction for which the client seeks our advice based on the details of the client's income and operations provided to us, and do not advise clients to take a position unless we believe it has at least a reasonable basis for being sustained by applicable tax authorities. If a client takes a tax position despite our advice to the contrary, we reserve the right to stop work for and terminate such client. In accordance with this tax philosophy, we engage with government and tax authorities on a collaborative basis and limit our advocacy activities with such authorities to (a) work for specific clients in need of regulatory compliance assistance and (b) providing financial support which advocates for the interests of the accounting industry as a whole (which may sometimes include limited tax advocacy). We maintain compliance with this policy through regular training of our employees and partners, internal policies on conduct, engagement documentation with our clients, and client retention reviews."

Company policies and practices for risk mitigation

PKF Francis Clark has established a comprehensive framework to mitigate risks associated with providing tax advisory services, particularly to prevent involvement in aggressive tax avoidance. As a firm regulated by the [Institute of Chartered Accountants in England & Wales \(ICAEW\)](#), all staff providing tax advice are required to comply with the PCRT, which sets out fundamental ethical principles, including integrity, objectivity, professional competence and due care, confidentiality, and avoidance of conflicts of interest. The PCRT explicitly prohibits creating or promoting tax planning arrangements that are artificial, contrived, or contrary to the intention of Parliament.

The firm supplements these external standards with an internal tax manual and a Tax Philosophy Statement, which emphasize adherence to economic substance, full disclosure, and ethical conduct. Staff are instructed to highlight any advice that might be contested by HMRC, ensuring clients are aware of risks and anti-avoidance implications. Tax engagements are assessed through a risk-grading framework (low, medium, high, enhanced), with high and



enhanced-risk cases requiring mandatory Tax Partner involvement, documented consideration of the [General Anti-Abuse Rule \(GAAR\)](#), and, where applicable, review under the [Disclosure of Tax Avoidance Schemes \(DoTAS\)](#) regime. The firm prohibits involvement in mass-marketed tax avoidance schemes, and any high-risk advice is case-specific, ethical, and transparent.

PKF Francis Clark aligns its practices with multiple professional and regulatory standards, including [ICAEW's Code of Ethics](#), GAAR, Targeted Anti-Avoidance Rules (TAARs), PoTAS (Promoters of Tax Avoidance Schemes), the [Bribery Act 2010](#), the [Criminal Finances Act 2017](#), and [UK Anti-Money Laundering regulations](#). Staff undergo annual fit-and-proper declarations, regular ethics and technical training, and Annual Standards Reviews to ensure compliance. An appointed Ethics Partner monitors adherence, supported by external oversight from ICAEW, HMRC, and PKF Global network audits.

Regarding international work, the firm explicitly prohibits planning that lacks economic substance or relies on artificial arrangements. In FY 2023/24, approximately 1.14% of total fees were derived from legitimate, client-specific international tax advisory services, including cross-border compliance, residence, domicile, and regularization matters.

The company also maintains robust conflicts-of-interest policies. Engagements are screened to prevent acting for opposing parties in litigation or transactional matters, and ethical walls or relocation of teams are used where conflicts exist. Clients are informed of potential conflicts to make informed decisions. Recruitment procedures include screening of new hires including those from government agencies to prevent conflicts and ensure compliance with anti-corruption and ethical standards.

Government affairs and lobbying

PKF Francis Clark operates within the United Kingdom's robust and evolving regulatory framework, which strongly deters tax avoidance and governs the conduct of tax advisers. Key measures include the General Anti-Abuse Rule (GAAR), Targeted Anti-Avoidance Rules (TAARs), Disclosure of Tax Avoidance Schemes (DoTAS), and the Promoters of Tax Avoidance Schemes (PoTAS) regime, alongside legislation such as the Criminal Finances Act 2017, Bribery Act 2010, AML regulations, and Professional Conduct in Relation to Taxation (PCRT) standards. These collectively require firms to implement comprehensive compliance procedures, assess risks rigorously, and ensure ethical conduct. From May 2026, mandatory HMRC registration for tax advisers will further reinforce standards. PKF Francis Clark has not faced any litigation or penalties from UK authorities regarding its tax advisory services.

In terms of advocacy, PKF Francis Clark engages in consultations through professional bodies and occasionally directly with HMRC and the Treasury to provide technical input on proposed legislation. This engagement is guided by fairness and clarity rather than seeking preferential treatment. Notably, the company contributed to shaping changes in Agricultural Property Relief



(APR) and Business Property Relief (BPR) proposals in 2025, successfully influencing the combined allowance from a proposed £1M to £2.5M to better reflect policy objectives.

The company publicly communicates its advocacy positions, sharing views on proposed legislative changes through its website, LinkedIn, and other media, and reports engagement undertaken through professional bodies, maintaining transparency and adherence to standards.

B Lab's Public Complaints Process

Any party may submit a complaint about a current B Corp through [B Lab's Public Complaint Process](#). Grounds for complaint include:

1. Intentional misrepresentation of practices, policies, and/or claimed outcomes during the [certification process](#), or
2. Breach of the core values articulated in our [Declaration of Interdependence](#) within the B Corp Community.