



TAX STRATEGY

SURESERVE GROUP'S PLC'S TAX STRATEGY

This paper sets out the tax strategy of Sureserve Group plc and its subsidiary undertakings (the "Group"), and in making this strategy available the Group is fulfilling its responsibilities under Schedule 19 of the Finance Act 2016. This tax strategy ("the Strategy") applies to all taxes applicable to the Group and the document is owned by the Board of Directors of Sureserve Group plc ("the Board"). The Strategy will be reviewed regularly by the Group's Risk Committee, which will in turn report at least annually to the Board for approval. Whilst the Board is responsible for setting and monitoring the Strategy, day to day management is delegated to the Group CFO.

The Sureserve Group is a compliance and energy services group that delivers comprehensive and high quality services in a range of sustainable markets including social housing, public buildings, education, energy services and industrial and commercial buildings. We take our responsibilities seriously, working in sensitive environments, upholding the highest standards of safety, care and responsibility. This extends to our back office functions and management of corporate affairs, of which taxation is a key element and Her Majesty's Revenue and Customs ("HMRC") an important stakeholder.

Our objectives are first and foremost to comply with UK tax law. We take our responsibilities very seriously, both to the tax authorities and our wider stakeholder base. We manage the Group's affairs with the most efficient means of delivery in mind and in this context, ensure management of taxes is aligned with the commercial and economic interests of the business, whilst taking a conservative approach to tax risk and being mindful of our reputation.

The Group's approach to management of tax risk and governance

The Board is ultimately responsible for tax strategy, risk management and governance and reviews and approves the Group's tax strategy annually. Day to day responsibility is delegated to the CFO, who oversees an experienced team, for whom a thorough understanding of taxation is a prerequisite of the role.

The Group Financial Controller oversees compliance and communicates regularly with local finance teams to inform them of changes in tax legislation, share experience of other divisions in addressing tax risks and provide support.

The Group has invested in a Group Internal Audit Manager whose role is to act independently in ensuring each business is operating in a tax compliant manner and overseeing tax governance. The Group Internal Audit Manager also supports the CFO in maintaining the Group's tax risk register.

Finally, the Managing Director and local head of finance of each business are asked to provide an annual tax attestation as part of the Senior Accounting Officer process.

The Group's attitude to tax planning

The Group will not engage in artificial transactions the sole purpose of which is to reduce tax. However, the Group considers it responsible to consider the most tax efficient means of undertaking commercial transactions. Paramount though is that any tax treatment is compliant with UK tax law and in line with our ethical values as a Group.

The Group will not engage in tax efficient transactions if the underlying commercial objectives do not support the position, or if the arrangements impact detrimentally upon the Group's reputation, brand, corporate and social responsibilities, or future working relationships with HMRC.

The Group employs BDO, a third party tax adviser, who guide the CFO, Group Financial Controller and local finance teams in all of their tax affairs. Finance teams are encouraged to seek advice of their local BDO office as a matter of course.

The Group and its tax risks

The Group's strategic aim is to improve each year, its tax risk rating as determined by HMRC's Business Risk Review process.

We take a conservative approach to managing tax risk and seek to achieve compliance through:

- a thorough review of all tax returns to ensure they are correct and possess sufficient detail
- submission of tax returns on a timely basis
- paying our taxes on time
- ensuring local finance teams receive full support, both internally and courtesy of third party advisers

We however realise there are risks in taxation, particularly specific to certain of the industries in which we work. We seek to understand the complex tax nature of our environment and will consult with our external advisers and where appropriate, our HMRC Customer Compliance Manager ("CCM"), where there are areas of concern or clarification is required.

Working with HMRC

The Group is in regular contact with its CCM and the dedicated team that HMRC has appointed with specialists in direct and indirect taxes. We update HMRC on a regular basis about developments in our business and we aim to supply the information they may require on a full and timely basis.

We aim to operate in an open and transparent manner and to resolve any disagreements with HMRC in a constructive and timely fashion.

This Tax Strategy document has been prepared by the Board and communicated to senior management to ensure the Group is aligned in ensuring its tax affairs are managed in a consistent, honest, compliant and timely manner.