The Group’s tax strategy, which includes the internal governance of tax matters and its approach to tax, is approved by the Group Board. The Group understands and observes its corporate and social responsibilities including paying the correct amount of tax.

Internal Governance

Responsibility for the implementation of the Group’s tax strategy rests with the Senior Accounting Officer.

The Group’s objective for its tax strategy is to minimise the risk of not paying the correct amount of tax and ensure that the Group meets its compliance obligations, including filing correct returns for all taxes. Although it manages its tax affairs in a proactive way, it does not enter into artificial arrangements that lack a commercial purpose in order to secure a tax advantage and, where there is an uncertainty, it carefully considers the position and, depending on the level of uncertainty, will obtain specialist third-party advice in order to gain clarity and increase its understanding of the issues.

The Group has a robust system of controls which are regularly tested to ensure that they remain fit for their intended purpose. They ensure that as a Group we are able to meet our taxation obligations and the requirements of the Senior Accounting Officer reporting obligations.

Attitude to Tax Planning

The Group does not use aggressive tax structures and all transactions have a business purpose or a commercial rationale. This does not preclude structuring the Group’s affairs efficiently for tax purposes.

Relationship with UK tax authorities

The Group's strategy is to have an open and honest relationship with the tax authorities. The Group values its relationship with and maintains an open dialogue with HM Revenue and Customs updating them on business activities on a regular basis and key developments as they arise.

Should an uncertainty or dispute arise with regard to the interpretation and application of tax law, the Group is committed to addressing the matter promptly and resolving it in an open and constructive way.

This tax strategy is published in accordance with the requirement set out in Paragraph 16(2) of Schedule 19 Finance Act 2016 and applies for the year ended 31 December 2019.