

## TAX STRATEGY

### 1. Introduction

The purpose of this statement is to set out Vertas Group's approach to tax and it should be regarded as the Group's tax strategy for the purposes of paragraph 16 (2) Schedule 19 in Finance Act 2016.

The Chief Finance Officer will review and refresh this strategy annually and the Suffolk Group Holdings Board (trading as Vertas Group) will approve any amendments.

In this statement references to "the Company", "Vertas Group" or "Group" shall be references to Suffolk Group Holdings Limited and all its subsidiary companies.

### 2. Group Tax Policy

The Group has a low level of risk appetite with regards to tax risk. The Group will conduct its tax affairs consistent with the following objectives:

- i. ensuring comply with all relevant laws, rules, regulations, and reporting and disclosure requirements; and
- ii. applying due professional diligence and care in the management of risks associated with tax matters ensuring that appropriate governance and assurance procedures are implemented.

### 3. Principals of Ethical Business Conduct

Vertas Group expects all of its employees to act ethically, honestly and with integrity in all dealings and business matters, including the Groups tax affairs. Vertas Group requires that all staff should act honourably, with honesty and integrity.

### 4. Tax Risk Management

Responsibility and accountability for the Group's tax affairs sits with the Group Chief Finance Officer who reports directly to the Board.

Diligent professional care and judgement is employed to assess tax risks in order to arrive at reasoned conclusions on how the risks should be managed. Where there is uncertainty as to the application or interpretation of tax law, appropriate advice will be taken from third party professional advisers to support the decision-making process.

Risk management processes and systems include compliance and risk monitoring systems and internal reviews of tax compliance activity through Group. The Group's Internal Auditors may be employed from time to time to undertake reviews of tax processes, procedures and risk.

### 5. Vertas Group and its tax risks

Vertas Group has a low appetite in terms of acceptable tax risk. The Group will seek to reduce

tax risk wherever practical through:

- i. the submission of all tax returns on a timely basis, including sufficient detail to enable tax authorities to form an accurate view of the affairs of the Group;
- ii. paying the appropriate amount of tax at the right time;
- iii. maintaining processes and controls that enable the company's tax returns to be calculated correctly in all material respects;
- iv. ensuring that key individuals who are involved in Vertas Group's tax processes are adequately trained and supported in order to manage tax compliance issues on a knowledgeable and timely basis; and
- v. taking appropriate advice from the Groups tax advisors when appropriate.

## **6. Relationship with tax authorities**

Vertas Group is committed to the principles of professionalism, openness and honesty in our discussions with HMRC with an aim to establish a clear “no surprises” relationship.