

## **Group Tax Strategy**

In compliance with section 161 and section 19 (2) of Schedule 19 Finance Act 2016, this sets out the tax strategy of The Shaw Trust Group, which includes Shaw Trust Limited as the ultimate parent company and all its subsidiaries for year ended 31 August 2023. Our tax strategy was approved by the Board of Trustees on the 27<sup>th</sup> July 2023.

The Shaw Trust Group is committed to comply with applicable tax laws and practices, whilst upholding its duty to its stakeholders to ensure that it makes the very best use of its financial resources for the furtherance of its charitable activities and demonstrate to the Charity Commission that the charity's affairs are managed efficiently and effectively.

### **The Shaw Trust Group is committed to:**

- Responsible, transparent and active management of our tax affairs.
- Maintaining an open and honest relationship with the tax authorities.
- Ensuring that the below tax strategy is consistent with the group's overall strategy.
- Applying a duty of care in our management of our tax risks and ensuring that our tax governance is appropriate.
- Timely and accurate tax compliance. At The Shaw Trust Group compliance means paying the right amount of taxes, in the right place, at the right time and involves disclosing all relevant facts and circumstances to the tax authorities
- Playing an active role in contributing to the UK charity tax policy-making process, including working with the Charity Tax Group.

Our commitment is underpinned by the following principles:

#### **1. Risk Management**

The Shaw Trust risk management framework is followed as part of our internal control processes and we have a specialist tax team who identify, assess and manage tax risks and account for them appropriately.

The risk framework is reported on at Board meetings on a quarterly basis.

The board are informed of improvements and provide governance and oversight of tax risks. There are robust internal policies, procedures, training and compliance programme to ensure alignment across the business in order to meet our tax obligations.

The Chief Financial Officer is ultimately responsible for tax strategy and reports to the Board on any significant issues arising from tax management or compliance.

#### **2. Attitude to Tax Planning**

The group participates in minimal tax planning, and only when the commercial needs of the business require it. The group engages in tax planning primarily to apply appropriate and efficient tax treatment in a cost-efficient manner to commercial, investment and financing decisions.

We do not seek to enter into non-commercial transactions to reduce tax nor do we seek to utilise artificial schemes which go beyond the intent of the legislation.

The UK Government has specific tax allowances and incentives to encourage investment in both infrastructure and employment, where these are relevant to Shaw Trust Group; they are applied in the manner intended.

Professional advice is sought on matters where the amount of tax is significant, and the tax treatment is uncertain in order to reduce this uncertainty and ensure that our interpretation of current tax law and practice is correct.

### **3. Level of Tax Risk Tolerated**

The Shaw Trust Group has a low appetite for tax risk. It does not participate in aggressive planning or complex structured arrangement designed to minimise its tax liabilities.

The tax risks are identified and logged on the tax risk register along with the associated controls. The net tax risks are actively managed.

The tax risks which are likely to occur and would have a significant impact on the business are escalated to the Corporate Risk register which is reported to the Board. An action plan for these risks is implemented to mitigate the impact on the business.

### **4. Approach to dealings with HMRC**

We actively seek an open dialogue with HM Revenue and Customs (HMRC), in pursuit of a professional and constructive working relationship.

We never deliberately conceal or knowingly misrepresent issues to HMRC. If we discover errors, we disclose them without delay.

All matters with HMRC will be addressed through timely, compliant and transparent discussions, we will ensure that we do not expose the group to any reputational damage or hinder our working relationship with relevant tax authorities including HMRC.

At present the group does not have a dedicated Customer Relationship Manager with HMRC.