

UK Tax Strategy

In accordance with Paragraph 19(2), Schedule 19, Finance Act 2016, Rosti Group sets out below its UK tax strategy for all UK companies within the Rosti Group of companies. This strategy applies from the date of publication until it is superseded.

Unless otherwise stated, references to 'Rosti' mean all UK companies within the Rosti Group.

The Rosti entities in the UK are subject to a broad range of UK taxes including corporation tax, VAT, employment taxes and business rates.

Risk Management and Governance Arrangements

Tax policy ultimately resides with the Board of Directors. The Directors of each Rosti legal entity also have a duty to ensure that risk is managed and that appropriate governance procedures are in place for their respective entities. To ensure that these duties are fulfilled a number of arrangements exist. These include:

- Taking decisions at an appropriate level, as governed by the Rosti's authorities in relation to tax matters.
- Regular reporting to Board of Directors and the Directors of UK legal entities.
- Regular documentation procedures including the identification, evaluation, monitoring and reporting of tax issues and risks.
- Complying with internal control procedures and processes, which are subject to regular reviews and self-assessment programs.
- Where there is potential uncertainty or complexity in relation to a UK tax risk, seeking and documenting external advice to support tax decisions may be sought.
- Implementing Rosti's core ethical behaviours and values.

Attitude towards tax planning

Rosti Group will not engage in tax planning other than that which is permitted by law and which supports genuine commercial aims. Where commercial activities and transactions may be structured in ways which have different outcomes for tax purposes, Rosti Group may structure those actions in a way which legitimately provides the most advantageous outcome. In the event that there is any doubt as to whether the structure of the commercial actions and the tax results might be contrary to the intentions of Parliament or perceived to conflict with the spirit of the law then Rosti Group will evaluate the actions through its internal tax governance arrangements and, where appropriate, discuss the matter with HMRC.

The level of tax risk that we are prepared to accept

Rosti Group's aim is to minimise the level of risk in relation to taxation at all times. Rosti Group is not prepared to accept a level of risk that exposes it to reputational harm or which could adversely impact its relationship with HMRC. Our approach to tax risk follows the same principles that apply to our management of all other business risks. To ensure that the level of risk is kept as low as possible, a number of risk management policies and governance arrangements are in place, including controls specifically relating to tax that must be adhered to for all tax types.

The approach towards dealings with HMRC

Rosti Group's approach to dealing with HMRC is to maintain an open, professional and transparent relationship in relation to tax planning, compliance, strategy, risks and significant transactions. Rosti Group commits to make full and accurate disclosures in tax returns and in correspondence with HMRC. We shall co-operate with HMRC at all times and deal with issues in a timely and collaborative manner.

Rosti Group shall comply with its legal obligations and interpret legislation in a reasonable way that is aligned with the intentions of Parliament. Where genuine differences of opinion occur on the application of tax law, Rosti Group will first seek to resolve these with HMRC through open dialogue and with reference to the relevant legislation and case law.