

# SEBDEN HOLDINGS LIMITED GROUP TAX STRATEGY

## Year Ending 31<sup>st</sup> March 2023

Sebden Holdings Limited and Subsidiaries (“Group”) regard the publication of this tax strategy as complying with our duty under section 160 and paragraph 16(2) Schedule 19 of Finance (No.2) Act 2016. The Group applies a consistent approach to Tax strategy to all companies in the group.

The Group considers that taxes are an important contribution to wider society and not just a cost to be minimised. In considering the tax affairs of the Group, we will take account of all stakeholders including shareholders, employees, customers, suppliers and HMRC.

The Group does not use marketed tax avoidance schemes, or arrangements that do not comply with current regulations.

Within the approach described above the Group will aim to structure its tax affairs as efficiently as possible and to claim relevant reliefs available to it.

### OVERVIEW OF INTERNAL GOVERNANCE

The tax policy is owned by the Board of Directors with responsibility allocated to the Group Financial Director. The policy is reviewed annually by the Board as part of the process of monitoring compliance with this tax policy in the Group.

Day to day management and implementation of the policy is delegated to the Group Financial Controller and, through them, to appropriate individuals.

### RISK MANAGEMENT

Operational risk is managed by the implementation of controls including segregation of duties, ensuring staff are appropriately experienced and trained. Control is also exercised through regular meetings of appropriate staff to ensure compliance with HMRC requirements.

The skills and experience of external advisers are utilised to:

- Ensure that the tax knowledge within the Group is complete and up to date
- Support internal staff on specific transactions or specialist areas of tax

Controls developed for the purpose of certification to HMRC by the Senior Accounting Officer apply to support the management of tax risk within the Group.

### RISK APPETITE

The Group has no appetite for tax risk. This can be defined as:

- not undertaking any transactions involving tax that are not fully supported by commercial activities or that could be considered artificial and
- ensuring sufficient and knowledgeable resources are available to undertake the Group’s tax reporting and compliance obligations.

### RELATIONSHIP WITH HMRC AND OTHER TAX AUTHORITIES

The Group aims to maintain good working relationships with HMRC based on:

- regular, open, real-time communication
- fair negotiations and
- timely completion of its reporting obligations and payment of any taxes due.