

CH & Co Tax Strategy

CH & Co Catering Group (Holdings) Limited is the ultimate UK parent company of the CH & Co group (“CH & Co”).

CH & Co has undertaken a review of its key tax procedures and now publishes its tax strategy in accordance with measures contained in Schedule 19 of Finance Act 2016.

The strategy has been approved by the Board of CH & Co and will be reviewed annually.

CH & Co approach to tax

We take a responsible and sustainable approach in relation to our tax obligations, as we understand the importance of the taxes we pay in supporting the various communities that we operate in.

CH & Co operate under the following principles:

- We comply with all relevant tax law, reporting and regulatory requirements.
- We interpret relevant tax laws in a way consistent with a relationship of co-operative compliance with tax authorities.
- We only engage in tax planning aligned to our commercial and economic activity that does not lead to any abusive result.
- We may appropriately utilise and claim available tax incentives and exemptions.

Governance and management of tax risk

The Chief Financial Officer (“CFO”) takes overall responsibility for the management of tax risk. On a day-to-day basis, tax risks are managed by the group finance team.

The Board, updated as appropriate by the CFO, exercises oversight of tax risk management and governance primarily through discussions at the monthly Board meetings. These meetings incorporate key tax information and issues arising within the business, or externally that could impact the business, for example upcoming legislative changes.

The group’s key tax risks include:

- **Transactional risk** - this includes actions taken in respect of transactions without consideration of potential tax implications, or where tax advice is not appropriately implemented.
- **Tax compliance risk** - this includes late filing or incorrect tax returns, failure to submit claims and elections on time, and late payment of taxes.
- **Reputational risk** - this includes the impact on our relationships with shareholders, customers, tax authorities, and the public.

We manage these risks by utilising suitably qualified and experienced finance team members and specialist external tax advisors, to prepare and file tax returns and also advise on areas of uncertainty. Oversight of advisors is provided by our finance team, including the CFO.

Collaborative working with HM Revenue & Customs (“HMRC”)

CH & Co is committed to acting with integrity at all times and to maintaining a transparent, open and honest relationship with HMRC.

We proactively engage with HMRC to disclose and resolve issues as they arise.

CH & Co has considered the Draft Framework for Cooperative Compliance published by HMRC in December 2015, which addresses the relationship between large business and HMRC and promotes best practice in tax governance.

We are committed to the following principles set out in the Draft Framework and have aligned our tax strategy accordingly:

- To promote collaborative professional working building an open, transparent and trusted relationship;
- To engage in open and early dialogue to discuss tax planning, strategy, risks and significant transactions and to disclose any significant uncertainty in relation to tax matters;
- To respond to queries, information and clearance requests in a timely manner and to ensure that HMRC are informed about how issues are progressing;
- To seek to resolve issues in real time and before returns are filed if possible;
- To make fair, accurate and timely disclosures in tax returns and correspondence;
- To work proactively with HMRC to resolve any disagreements over tax that may arise by reaching a consensus view where possible;
- To be open and transparent with regards to decision making, governance and tax planning;
- To structure transactions such that tax results that are not inconsistent with the underlying consequences (unless specific legislation is intended to give that result) and which we believe give a result which is not contrary to the intentions of Parliament;
- To interpret tax laws in a reasonable way and ensure transactions are structured in a way that is consistent with a relationship of cooperation with HMRC.

Transparency and tax evasion

- We support the UK Government’s adoption of the OECD’s Base Erosion and Profit Shifting recommendations.
- We do not tolerate tax evasion or the facilitation of tax evasion by any persons acting for or on behalf of CH & Co.