

Introduction

The following information is provided in compliance with the requirements of Finance Act 2016 Schedule 19, paragraph 16(2).

The Board's Policy on Taxation in the United Kingdom is reproduced below:

Policy on UK Taxation

This policy applies from the date of publication, is effective for the year ending 31 December 2017 and until it is superseded. Our tax strategy for the UK is reviewed annually.

The aim of our policy is to be compliant with all UK tax legislation whilst at the same time ensuring that the tax strategy complements and supports the overall strategy of the Group.

Our aim is to be open, transparent and comply with the UK tax authority, and to engage in constructive dialogue and provide clear transparent information where required.

We do aim to structure our operations and our finances in a tax efficient manner, which may include detailed tax planning. However such tax planning will be used to support commercial and/or operational decisions and will not be implemented in isolation without a clear commercial or operational purpose.

Oversight of UK tax strategy and policy will be provided by the Chief Financial Officer, who is also the Senior Accounting Officer of the Group for UK tax regulatory purposes. His responsibility includes regular review of the tax activities of the Group and reporting as key tax matters as necessary to the Board of the Group.

Responsibility for day to day tax matters and governance is delegated to the Group tax department which includes specialists in UK tax.

Approach to tax risk management and governance

We actively manage tax risks across the group. Our approach includes assessing tax risks on a regular basis. We also ensure that appropriate controls and defined procedures are in place to manage tax risk.

A key part of this is ensuring we employ within our tax team appropriately qualified individuals with a deep specialist knowledge of UK taxation. Their roles and responsibilities are clearly defined and we ensure those individuals are well trained and up to date on their tax knowledge. Where there is significant complexity or uncertainty in relation to tax risk or to support improving internal knowledge and experience, external professional advice is sought.

Specifically in relation to UK tax we have clearly defined policies and procedures.

The Group has an ongoing year round assessment with respect to Senior Accounting Officer legislation. On an annual basis the results of this work are formally reviewed for the purposes of the Senior Accounting Officer Certificate. This includes written confirmation from the senior leaders of each UK business that policies and procedures have been adhered to.

Transfer pricing risk is actively managed through reviews of commercial terms and benchmarking studies where necessary to ensure arm's length pricing for goods and services which move across national borders. Businesses within Doncasters typically operate autonomously and on arms-length commercial terms.

Level of tax risk the group is prepared to accept

Our UK Tax strategy is intended to complement our overall Group strategy and as a general guide we do not have an appetite for significant tax risk. Risk in relation to tax cannot be eliminated in its entirety but our approach to tax risk management is intended to mitigate it to the fullest extent possible. We will always strive to ensure we comply with the relevant tax legislation.

There may be instances where we are prepared to accept higher levels of tax risk. However such instances will be limited in number and will always be part of a wider commercial objective where tax risk is only a limited part of the overall risk assessment.

To the extent there is any significant uncertainty regarding the likely tax risk of a particular transaction advice will be sought from an established and credible tax specialist before proceeding.

For routine and established tax compliance procedures we have a very low tolerance of risk and aim for a high standard of accuracy and compliance with reporting procedures and deadlines.

Tax risks are shared and discussed with the Board as appropriate.

Attitude towards tax planning

We have a responsibility to our shareholders to ensure our operations and financial activities are conducted in a tax efficient manner. We are committed to complying with our tax obligations and as noted previously where tax planning is considered it will only ever be used to support clear commercial and operational decisions and never in isolation.

Approach towards dealings with HMRC

The Group meets regularly with HMRC through the CRM and also with various tax specialists within HMRC. This interaction is led by our Group tax manager and where appropriate includes the Chief Financial Officer. Our aim is to work collaboratively and proactively with HMRC to resolve matters arising which might include areas such as where legislation or guidance is unclear and there is a significant tax impact.

We aim to have an open constructive dialogue on all significant matters on a regular basis with HMRC. We have a track record over a number of years of regular dialogue with HMRC and we are committed to prompt disclosure and transparency in all tax matters with HMRC.

Where appropriate, the Group seeks advance clearance from HMRC on the proposed tax treatment of transactions.