

# Collinson Group Tax Strategy

April 2024

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The following information is provided by the Collinson Group (“Collinson”) for the year ended 30 April 2024 in compliance with the requirements of paragraph 19 (2), schedule 19 of the Finance Act 2016. The publication of this tax strategy is regarded as complying with the Group’s duty under paragraph 16 (2), schedule 19 of the Finance Act 2016. It applies to all effective group subsidiaries.

This tax strategy was approved by the Board on 30 April 2024.

## **Tax Governance**

The Governance of our business is led by the Board of Directors, all of whom are committed to ensuring Collinson continues to meet its business, financial and sustainability objectives. The Board has overall responsibility for strategy, governance, ethical trading and risk management, including taxation, globally.

Integral to our success is our integrity and reputation which is articulated in the Collinson Code of Conduct, which provides the ethical framework in which our staff operate. This Code sets out our high standards of professional conduct, which extends to our approach to tax, as it does to all our financial matters.

We are committed to complying with our Global tax compliance requirements in a transparent and timely manner while maintaining our high professional standards. We aim to be a good corporate citizen which includes paying appropriate taxes due in the jurisdictions in which we operate. We make a significant fiscal contribution in each of the countries in which we operate through meeting our obligations with respect to: corporation tax; VAT / sales taxes; employment related income tax and social security contributions as well as all other relevant direct and indirect taxes. We strive to maintain the balance between paying the appropriate amount of taxes and protecting shareholder value by making use of legitimate reliefs and allowances as intended.

## **Internal Governance**

Regional Financial Controllers have a first line of responsibility within their regions and tax jurisdictions for regional financial compliance, including tax. They report directly into the Group Financial Controller. Within Airport Dimensions and Insurance, Divisional Vice Presidents of Finance have a first line of responsibility within their Divisions, with Divisional Financial Controllers reporting directly to them. Other Divisions are supported by the Regional Financial Controllers with a Head of Finance having commercial financial responsibility for the Division.

Management and policy implementation are overseen by the Group Tax team. All Group Tax policies and tax risk management guidance are reviewed on an ongoing basis as part of the tax and financial

planning cycle in conjunction with oversight from the Group Risk Committee and the Audit Committee of the Collinson Board of Directors.

The Group Head of Tax is responsible for updating the Board periodically on key tax matters. This update will cover:

- The Group's UK and global tax positions and any significant changes to it;
- Assurance that the Group's tax position is robust and any judgment based decisions are in line with local and global standards;
- Any disputes with relevant tax authorities and how these are being managed;
- The management of other key tax risks across the Group;
- Any key changes to legislation or practices which may impact the Group.

The Group Head of Tax is responsible for the Group Tax team and reports directly to the SVP of Global Finance who reports to the Group CFO.

The Group Tax team is comprised of appropriately qualified individuals who are engaged with relevant tax training opportunities to maintain up to date tax knowledge and expertise. The team is segregated by skill set so that people with the appropriate specialism manage relevant risks. Where necessary, professional advice is sought from qualified tax advisers

All Group Tax work is supported by relevant documentation with reviews carried out to ensure that it is comprehensive. UK and local legislation is always adhered to in Group Tax's provision of tax services across the Group.

### **Risk Appetite**

The Board of Directors is responsible for setting the Group's appetite for all aspects of risk, including tax. The Collinson Board has a low appetite for risk in all matters relating to tax.

- We do not engage in aggressive tax planning, avoidance or offshore schemes to artificially reduce tax payable by Group companies.
- We take a commercial, rather than a tax driven, approach to the management of our business, seeing our tax affairs as a consequence of doing business and not the reason for a transaction.
- Where tax efficiencies can be achieved on the back of commercially led transactions such as group reliefs, tax free allowances, we will seek to use these as set out in legislation and only as intended by such legislation.
- As a services business, we have staff in each jurisdiction in which we operate and pay tax in those territories. We do not artificially move our profits from one territory to another to gain a tax advantage.

### **Risk Management**

The Board is responsible for the Group's system of risk management and internal control. Risk is assessed across the Group using a systematic risk management model covering both external and internal factors. The complex international tax environment means that a degree of risk is inevitable regardless of our approach to managing tax risk.

In line with our business generally, we adopt a risk-based approach to tax management; we identify risks and assess in terms of the likelihood and impact of their occurrence, both at an inherent risk level and a residual, post-control level. The Group Tax policies set out the compliance, operational, transactional and reputational risks we face and guidelines on how to manage and mitigate the risks. Where the Group/divisions/subsidiaries consider that actions or control improvements are necessary in order to further mitigate risks, we implement appropriate action plans.

Where appropriate and with guidance from the SVP Global Finance and Group Tax, significant risks may be escalated to the Group Risk Committee and, ultimately, Board level.

The Group's key tax risks are as follows:

- Not preparing and filing required documentation in a timely manner;
- Preparing and filing documentation which includes errors;
- Not collecting, withholding or paying the correct amount of tax in a specific jurisdiction;
- Not being registered for tax in the jurisdictions required;
- Not having the appropriate documentation on file to support our tax position;
- Not documenting and implementing appropriate transfer pricing policies;
- Not representing the appropriate levels of tax in the Group's financial statements.

These specific risks are mitigated by ensuring the following:

- The Group Tax team have the appropriate tax expertise;
- There is a robust system of review within the Group Tax team, including segregation of duties;
- The Board and the wider Group are aware of the importance of the involvement of Group Tax in business decisions taken;
- The Group Tax team support the business in any situation where there is a tax implication;
- Appropriate controls and processes are in place to adhere to relevant deadlines;
- Necessary documentation is in place to support the any position taken;
- Appropriate assurance is requested from professional tax advisers in complex situations or where there is any element of risk or there is a high level of judgment involved in a decision;
- Regular reviews of processes and data are performed to confirm in line with documented policies.

### **Relationship with HMRC and other tax authorities**

Collinson is committed to the principle of transparency and an open approach in dealing with HMRC in the UK and other tax authorities in the jurisdictions in which we operate. Our dealings with tax authorities will be conducted in a courteous, professional and timely manner. We aim to achieve early agreement on disputed matters and to achieve certainty where possible.

The Group maintains a strong, proactive relationship with HMRC and other tax authorities and we aim to engage in early dialogue in respect of potential tax risks and/or significant transactions within the Group.

Following the introduction by HMRC of Corporate Criminal Offences ("CCO") the Group has performed appropriate risk assessments which it will continue to review on a regular basis to ensure reasonable prevention procedures are in place with regards to its associated persons.

## Appendix 1

[Publish your large business tax strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

### What must be in your strategy

Your tax strategy should be approved by your Board of Directors, be in line with the overall strategy and operation of your business and include:

- details of the paragraph of the legislation it complies with
- the financial year the strategy relates to
- how your business manages UK tax risks
- your business's attitude to tax planning
- the level of risk your business is prepared to accept for UK taxation
- how your business works with HMRC
- any other relevant information relating to taxation

### How your business manages UK tax risks

Include all information that demonstrates your business's approach to risk management and governance. This may include, but is not limited to:

- how your business identifies and reduces inherent tax risk due to the size, complexity and extent of change in your business
- the governance framework you use to manage tax risk
- the levels of oversight and involvement of the Board of Directors
- a high level description of any key roles, responsibilities, systems and controls in place to manage tax risk

### Your business's attitude to tax planning

Outline your business's attitude towards tax planning and give details relating to UK taxation. Also include all information regarding the approach your business has towards to tax planning, including:

- details of any code of conduct your business has for tax planning
- an outline of what influences your business's tax planning and how this affects your tax strategy
- your approach to structuring tax planning
- an explanation of why you might seek external tax planning advice

### **The level of risk your business is prepared to accept for UK taxation**

Explain:

- what levels of risk your business is prepared to accept, and give details of the internal governance process for measuring this
- the influence relevant stakeholders have

### **How your business works with HMRC**

Explain how your business deals with HMRC. We may already know this but it must still be included in the document. It may include (but is not limited to):

- an explanation of how your business works with HMRC to meet statutory and legislative tax requirements
- how your business works to be transparent with HMRC on current, future and past tax risks across all relevant taxes and duties