

UK Tax Strategy

Scope

This tax strategy applies to DAC Beachcroft LLP and all UK affiliated entities (“the UK Firm”) and complies with its duty under Finance Act 2016, Schedule 19, Paragraph 16. This statement applies for the financial year 30 April 2022 and subsequent financial years. It is periodically reviewed to ensure its continued accuracy.

Tax Objectives

The UK Firm’s overriding principle in respect of its tax strategy is to ensure all statutory obligations are met. The Tax Strategy contributes to the Group’s purpose of creating sustainable value by minimising any negative operational impacts of tax-related decisions and avoiding the risk of reputational damage to the Group. The UK Firm has a low risk appetite in respect of legal and regulatory compliance, and more specifically a low appetite for aggressive tax planning. The UK Firm expects that Members and Employees comply fully with relevant tax laws and regulations.

In this context, the Tax Objectives are set out below:

- to pay the right amount of tax at the right time in the right country;
- to fulfil all of the UK Firm's compliance and disclosure requirements in a responsible way;
- to ensure all the UK tax returns are compliant and filed on a timely basis and, where applicable, enable Members to meet their individual tax compliance and filing requirements;
- to ensure the UK Firm's tax planning is not contrived, artificial or without commercial substance and only utilises those incentives available in line with tax legislation. The UK Firm should be mindful of public perception, whilst minimising tax inefficiencies;
- to remain transparent to the various stakeholders to whom the UK Firm has a responsibility, including the relevant authorities;
- to engage internal or external expertise as deemed necessary wherever there is sufficient clear material uncertainty as to the correct application of tax law;
- to ensure all of the UK Firm's systems are adequately robust and compliant in order to support the tax strategy;
- To engage with HMRC and other tax authorities openly and with integrity and honesty.

Governance

The Tax Strategy is approved and owned by the LLP Group Board of DAC Beachcroft. Ultimate responsibility for the Tax Strategy and compliance thereof rests with the Executive.

The tax strategy is reviewed periodically.

The Chief Financial Officer (‘CFO’) (a member of the Executive and LLP Group Board) has accountability to the LLP Group Board for the management of tax arising from our business operations. Day to day management of the UK Firm’s tax matters are delegated to appropriately experienced and/or qualified staff, who work alongside our external tax advisors, to meet our tax obligations.

Each management and legal entity within the DACB Group should identify a Responsible Tax Officer ('RTO') who is assigned responsibility for ensuring the UK Firm's Tax Strategy is appropriately applied within the relevant entity. This includes ensuring the Tax Objectives are appropriately pursued and the tax risks are effectively managed. Any tax specialists (both in house and external) used to calculate or advise on tax matters should be approved by both the relevant RTO and the CFO.

The RTOs (who may delegate authority to different people for different taxes) are responsible for ensuring - and reporting to the CFO - to the best of their knowledge and ability, that steps have been taken to ensure that key local tax obligations have been taken into account, and that tax filing and payment obligations have been met on a timely basis with due care and attention to accuracy: and that tax risks have been monitored and any particular issues or risks have been identified.

The Tax Team is responsible for overseeing the management of taxation from a UK Firm perspective. The Team manages, maintains and routinely reviews internal systems, processes and controls to deliver compliance in line with our UK tax obligations. This also involves, their direct co-ordination of certain inter-Group trading agreements and Transfer Pricing/recharging arrangements; their consultation in the selection of external tax advisors (and their access to such advisors); and their early engagement in and thorough involvement in structuring and corporate transaction initiatives.