

# Churchill Group Tax Strategy FY23



## The Churchill Group Tax Strategy 2022/23

This document sets out the Churchill Group Tax Strategy for the period 1<sup>st</sup> July 2022 to 30<sup>th</sup> June 2023, in accordance with UK legislation as set out in Schedule 19 Part 2 of the Finance Act 2016. All taxes are covered, including, but not be limited to Corporation Tax, Value Added Tax (VAT), Pay-As-You-Earn (PAYE), National Insurance Contributions (NIC), Stamp Duty Land Tax and Insurance Premium Tax.

Oscar Topco Limited (the Group's Ultimate Parent company) and its subsidiary undertakings, trading as "Churchill Group" is a private limited company based in the UK, comprising a number of expert businesses delivering services within the facilities management industry, including cleaning, security, catering and environmental. As a group we believe in doing right by our people, our customers, our society and our planet and we exist to deliver the best possible outcomes by making people happier and safer in their environments. Each of our expert businesses has its own core purpose to enhance the environments it delivers in, all contributing to our principal philosophy of doing the right thing. In formulating the Group's tax strategy the Board have adopted the same principle of doing the right thing.

In this strategy references to "the Group" or "Churchill Group" shall be references to Churchill Contract Services Group Holdings Limited and all its subsidiary companies.

This strategy has been prepared by [SAO] in conjunction with the Board of Directors, who have ultimate oversight for tax for the Group. This strategy has been approved by the Board and will be reviewed annually; any significant changes to this strategy will be approved at Board level.

The purpose of the Churchill Group Tax Strategy is to provide guidance and to detail Churchill's approach to tax; it is applicable to all group entities.

### Churchill Group's approach to tax governance and risk management

Churchill Group expects all of its employees to act ethically in all business matters, including its tax affairs and is committed to complying with all UK laws, regulations, reporting and disclosure requirements. In doing so it ensures that effective governance is embedded within the business.

Churchill Group manages its tax risk by ensuring any risks any company in the Group may be exposed to are identified and recorded in the Group risk register, together with mitigative actions for those risks. The register is monitored by the SAO, the Group General Counsel and the COO and is reviewed and updated every 6 months.



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More specifically, our finance teams are responsible for completing all applicable returns in an accurate and timely manner, unusual or exceptional transactions are reviewed from a tax perspective. Furthermore, we invest in a retained tax and professional services advice service to ensure we have a mechanism to seek support when needed.

The transactional finance and payroll teams are led by qualified accountants who engage in regular continued professional development as required by their professional accounting body. Exceptional transactions are reviewed by our professional advisors.

Any commercial decision(s) do not override compliance with applicable tax law. The Group CEO is the appointed Senior Accounting Officer “SAO”.

## Churchill’s approach to tax planning and its tax obligations

We take the following approach to our tax obligations:

1. We pay the right amount of tax at the right time in accordance UK tax law.
2. We do not undertake any transactions with the sole purpose of achieving tax savings or for tax avoidance purposes.
3. We regularly review changes in tax legislation and assess any impact on our business to ensure we operate in accordance with those changes and comply with our tax obligations.
4. If we are uncertain as to how tax law may apply to our business we seek professional third party advice.
5. We identify, monitor and minimise our exposure to tax risk within the legislative framework and spirit of the law.
6. We ensure that effective tax processes and procedures are embedded within our business.

The principles outlined above are reviewed on an annual basis by our Board of Directors and adherence to them will be monitored by the [Chief Financial Officer/Group Finance Director and the Group General Counsel].

## Churchill’s approach towards acceptable levels of risk

Our appetite to risk is low and our reputation is paramount, therefore, we will not engage in artificial tax arrangements nor will we undertake any transactions for the sole purpose of achieving tax savings or to avoid tax.

Our attitude to risk is approved and monitored by the Board of Directors. Internal and External advisors are consulted with during bi-annual risk reviews, and no other stakeholders influence tax policy.



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## Churchill's approach to dealing with Tax Authorities

As part of our commitment to meet our tax obligations we adopt a collaborative approach to all dealings with HM Revenue & Customs, adopting a proactive and transparent stance in all communications and referring to HMRC for guidance where any uncertainty may exist.

Dated 29 July 2022

