

Annington Limited Group Tax Strategy for the year ended 31 March 2022

1. Introduction

This statement is issued by Annington Limited and covers the operations of Annington Limited and its subsidiaries and associates (together the “Annington Group”), all of which are registered in the United Kingdom. The Annington Group is one of the largest private owners of residential property in the United Kingdom.

The Annington Group enjoys a unique role as the MoD's primary landlord (“MQE portfolio”), benefiting from stable, long-term, contracted rental income with the potential for significant capital appreciation. In addition Annington Group manage residential property that form the Non-MQE Portfolio.

The Annington Group's tax strategy is reviewed and approved by the Board of Directors of the Annington Group for the year ended 31 March 2022 pursuant to Paragraph 19(2) Schedule 19 of the Finance Act 2016 and applies to all members of the Annington Group in the United Kingdom.

2. Risk Management and Governance

The Annington Group's Chief Financial Officer is appointed as the Annington Group's Senior Accounting Officer (“the SAO”) and has principal day-to-day oversight of the Annington Group's tax accounting arrangements in the United Kingdom.

Tax monitoring and risk assessments, across all relevant taxes, are performed, monitored, identified and documented by the in-house tax team and then reviewed and approved by the SAO on an annual basis for the SAO certificate to be signed off.

On an annual basis, a formal assessment of the Annington Group's exposure to tax risks and the responses and mitigating actions in place to minimise these risks is performed. During the assessment, the Annington Group monitors tax processes relating to taxation records and reporting across all areas of taxation for which Annington group is liable undertaken. The review performed is designed to identify risks and weaknesses, summarise mitigating actions that resolve or reduce the impact of any weaknesses and summarise any known errors. This will lead to an overall assessment of the tax accounting arrangements existing on an annual basis. Tax processes are assessed for risk on an on-going basis as part of the normal operations of the finance team.

A summary of tax compliance deadlines is maintained to identify all these deadlines and complete tasks in suitable timeframes. A tax compliance calendar is maintained to record each tax return submission deadline and tax payable deadline, and the dates actually submitted and tax payable or repayment status.

3. Attitude to tax planning

The Annington Group aims to comply with applicable tax law and regulations.

The Annington Group's Board of Directors and the SAO take responsibility for ensuring the compliance of the Annington Group's tax strategy and tax returns and monitors changes in relevant tax law and practice in order to assess any consequences and impact for the Group and implement any required updates and changes.

Annington's strategy for staffing is summarised as having the right person for the job, in many instances, because of the technical nature of the work involved, this will require staff to be qualified members of professional bodies with necessary experience and skill set. This applies equally across all departments and includes the finance professionals working on inputs to the taxation processes.

The Annington Group has appointed an external professional tax advisor to review the Annington Group's corporate tax computations, and then submit corporate tax returns to HMRC independently. The Group also consults regularly with external professional legal, accounting and tax advisors for complex transactions.

4. The level of risk accepted

The Annington Group only has tax exposure to its activities in the United Kingdom.

The Annington Group aims to comply with applicable tax law and regulations, and pay correct tax amounts due within deadlines. The Annington Group is also committed to zero tolerance for tax evasion.

Tax returns submitted to HMRC meet statutory and legislative tax requirements and are supported by appropriate audit documentation.

Written advice or advanced clearance will be sought for any areas which are unclear or subject to interpretations.

5. Working with HMRC

The Annington Group is committed to build a good working relationship with HMRC with prompt disclosure and transparency in all tax issues.

Regular contact is made with our Customer Compliance Manager at HMRC by our SAO and we also schedule meetings when a complex transaction or refinancing is completed.

The Annington Group aims to be transparent with HMRC by seeking advance tax clearances on potentially uncertain tax positions as appropriate.