

# **Imperial Mobility UK Group**

## ***Tax Strategy***

### **Scope**

This Tax Strategy applies to Imperial Mobility UK Limited and to the group of companies headed by Imperial Mobility UK Limited in accordance with paragraph 19 of Schedule 19 to the Finance Act 2016. A list of the entities to which it applies is set out in Appendix I. In this Tax Strategy, references to 'Imperial Mobility UK Limited', or the 'Group' are to all entities within Appendix I. The Tax Strategy is being published in accordance with paragraph 16(2) of the Schedule.

This Tax Strategy applies from the date of publication until it is superseded. References to 'UK Taxation' are to the taxes and duties set out in paragraph 15(1) of the Schedule which include Income Tax, Corporation Tax, Diverted Profits Tax, PAYE, NIC, VAT, Insurance Premium Tax, Customs & Excise Duties, and Stamp Duty Land Tax. References to 'tax', 'taxes' or 'taxation' are to UK taxation and to all corresponding worldwide taxes and similar duties in respect of which the Group has legal responsibilities.

This Tax Strategy was approved by the Board of Imperial Mobility UK Limited on 26 June 2018. Any subsequent amendments to this Tax Strategy will be approved by the Board.

### **Aim**

Imperial Mobility UK Limited is committed to full compliance with all statutory obligations and full disclosure to relevant tax authorities. The Group's tax affairs are managed in a way which takes into account the Group's wider corporate reputation in line with Imperial Mobility UK Limited's overall high standards of governance.

### **Governance in relation to UK taxation**

Ultimate responsibility for Imperial Mobility UK Limited's tax strategy and compliance rests with the Board of Imperial Mobility UK Limited.

Executive management of tax matters, including the Group's tax strategy is delegated by the Board to the Chief Financial Officer of Imperial Logistics Holding UK Limited.

The Financial and Risk Review Committee's requirement to monitor the integrity of Imperial Mobility UK Limited's financial reporting system, internal controls and risk management framework, expressly includes those elements relating to taxation.

Day-to-day management of Imperial Mobility UK Limited's tax affairs is delegated to the Group Financial Controller, who reports to the Chief Financial Officer during the year on a regular basis.

The Finance and Human Resources departments are staffed with appropriately qualified individuals.

The Board ensures that Imperial Mobility UK Limited's tax strategy is one of the factors considered in all investments and significant business decisions taken.

The Chief Financial Officer reports to the Financial and Risk Review Committee and the Board on Imperial Mobility UK Limited's tax affairs and risks during the year.

## **Risk management**

Imperial Mobility UK Limited operates a system of tax risk assessment and controls as a component of the overall internal control framework applicable to the Group's financial reporting system.

Imperial Mobility UK Limited seeks to reduce the level of tax risk arising from its operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations.

Processes relating to different taxes are allocated to appropriate process owners, who carry out a review of activities and processes to identify key risks and mitigating controls in place. These key risks are monitored for business and legislative changes which may impact them and changes to processes or controls are made when required.

Appropriate training is carried out for staff outside of the Finance and Human Resources departments who manage or process matters which have tax implications.

Advice is sought from external advisers where appropriate.

## **Attitude towards tax planning and level of risk**

Imperial Mobility UK Limited manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax.

When entering into commercial transactions, Imperial Mobility UK Limited seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation. Imperial Mobility UK Limited does not undertake tax planning unrelated to such commercial transactions.

The level of risk which Imperial Mobility UK Limited accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the Group's tax affairs. At all times Imperial Mobility UK Limited seeks to comply fully with its regulatory and other obligations and to act in a way which upholds its reputation as a responsible corporate citizen. In relation to any specific issue or transaction, the Chief Financial Officer is ultimately responsible for identifying the risks, including tax risks, which need to be addressed and for determining what actions should be taken to manage those risks, having regard to the materiality of the amounts and obligations in question.

## **Relationship with HMRC**

Imperial Mobility UK Limited seeks to have a transparent relationship with HMRC through communication and disclosure of material matters in respect of developments in Imperial Mobility UK Limited's business, current, future and retrospective tax risks, and interpretation of the law in relation to all relevant taxes.

Imperial Mobility UK Limited ensures that HMRC is kept aware of significant transactions and changes in the business and seeks to discuss any tax issues arising at an early stage. When submitting tax computations and returns to HMRC, Imperial Mobility UK Limited discloses all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain.

Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.

**List of entities covered by this Tax Strategy**

- Imperial Mobility UK Limited
- Imperial Logistics Holding UK Limited
- Palletways Group Limited
- Palletways (Europe) Limited
- Palletways Finance Limited
- Palletways Holdings Limited
- Palletways (UK) Limited