

The Billington Group Tax Strategy – Updated August 2021

Introduction

This document sets out the tax strategy for Edward Billington and Sons Limited and its subsidiaries - (the group) as required by para 16 (2) of schedule 19 of the Finance Act 2016.

It covers all UK taxes and duties which the company is subject to. It is effective for the year ended 30th August 2020.

Scope

The group is committed to conducting its tax affairs to comply with UK Tax legislation and manage its tax policy in accordance with the board's principles and shareholder expectations.

Risk management

The group's tax strategy is part of an overall risk strategy, with the chief financial officer taking responsibility for this and reporting to the board.

Professional diligence and care is applied to our management of all risks associated with tax matters to evaluate those risks. Appropriate training is carried out for staff who manage or process matters which have tax implications. Where there is uncertainty as to the application or interpretation of tax law, appropriate advice is taken from third party advisers.

Attitude to tax planning

The group's tax strategy is reviewed on an ongoing basis by the senior finance staff with reporting to the board of relevant issues to ensure that it is in line with the group's commercial strategy.

When entering into commercial transactions, the group will use incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation. It will not use them for purposes which are knowingly contradictory to the intent of the legislation.

The group operates a zero-tolerance approach to tax evasion whether carried out by an employee, or a business partner acting for us, or on our behalf. The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training.

Level of risk

The group is committed to applying diligence and care in our management of tax risk. The policy is to minimise risk wherever possible. We seek to identify, evaluate and manage UK tax risks to mitigate such risks and where there is significant uncertainty or complexity in relation to a risk, external advice is sought.

Approach towards dealing with HMRC

The group is committed to the principles of openness and transparency in dealing with HMRC. When appropriate, the group ensures that HMRC is kept aware of significant transactions and changes in its business and seeks to engage in early dialogue with HMRC on any tax issues that arise.

When submitting tax computations and returns to HMRC, commits to make fair, accurate and timely disclosure, and respond to queries and information requests in a timely fashion.