

Rainy City Investments Limited, Peninsula Business Services Group Limited & subsidiary companies

Tax Strategy Document
Year ending 31st March 2023

Contents

- 1. Introduction**
- 2. Approach to Risk management and Governance**
- 3. Attitude towards tax planning**
- 4. Level of risk in relation to UK taxation**
- 5. Approach to dealings with HMRC**

1. Introduction



The tax strategy document (the 'Tax Strategy') sets out the standards the Board of Rainy City Investments Limited ('the Board') applies in respect of the management of UK taxes and the framework of governance it employs to ensure those standards are embedded throughout the Group.

This Tax Strategy is applicable to the ultimate holding company being Rainy City Investments Limited, the intermediate holding company being Peninsula Business Services Group Limited and all its UK subsidiaries (together the 'Group'), and all the Group's employees engaged in the management and administration of tax.

The Group aims for all the UK relevant tax affairs to be transparent and to adhere to all UK tax laws and regulations.

The tax strategy has been prepared in accordance with the requirements of Section 161 and Schedule 19 of Finance Act 2016.

2. Approach to Risk Management and Governance



The Tax Strategy is approved by the Board and is owned by the Group Chief Financial Officer ('Group CFO'), who is responsible for ensuring that tax is represented in all significant business decisions taken by the Board or, as appropriate, the boards of the intermediate holding company or UK subsidiaries.

The Group CFO is also the Senior Accounting Officer ('SAO') who is responsible for managing the overall tax relationship with HMRC.

Operational tax responsibility, dependent on its nature, is delegated to members with the Group finance team or within the finance team of each subsidiary who report through to the Group finance department and the Group CFO. The purpose of this is to ensure timely and accurate submission of the Group's tax returns and associated tax payments. It is the responsibility of the individual members of the finance teams to comply with the policies and procedures established.

The strategy is considered annually for ongoing relevance and to reflect material changes either in tax legislation or the nature of the business that requires the policy to be updated.

In order to ensure that tax is considered by those persons within the Group who hold senior positions, open and regular communication is expected between the Group finance team and those individuals.

In particular, those with responsibility for the following areas are expected to ensure that they, or members of their teams, receive appropriate updates on relevant tax developments and they should seek tax input for all significant commercial transactions:

- Finance;
- Payroll and Benefits;
- Property;
- Legal;
- Insurance; and
- HR.

In addition the Group CFO and those with responsibility for Group tax matters ensure regular dialogue is maintained throughout the year and formal meetings are arranged to discuss Group tax compliance status, any material tax issues facing the business and future significant tax developments that may impact the business.

The Group aims to manage its risk through:

- Ensuring the IT systems that are in place to capture the data, which feeds into the tax returns, are robust and continually monitored and updated where necessary;
- Strong tax compliance procedures to ensure the tax returns which are prepared are accurate and complete;
- Internal review processes, from appropriately qualified individuals, in respect of all tax returns which are submitted to HMRC;
- Maintaining documentation to provide factual support to all tax returns submitted;

- Recruiting and training appropriately qualified individuals to deal with the various different taxes for which the Group is responsible;
- Involving appropriate tax specialists in significant business decisions; and
- Engaging in dialogue with HMRC as appropriate and being transparent in all such dealings.

In addition to internal resource, the Group is committed to maintaining a close relationship with external advisers and engaging with them where there are:

- Complex technical areas which require specialist knowledge and experience which are non-routine;
- New taxes or significant changes to existing tax regimes which are material for the Group.

3. Attitude towards tax planning

The Group's reputation and integrity is of paramount importance, as such will not engage in tax planning that may bring the Group into disrepute.

In particular, the Group does not participate in tax schemes which seek to exploit perceived loopholes within the tax legislation.

Tax planning is focused around ensuring the Group is fully aware of the implications of carrying out business transactions and taking steps to reduce tax costs in line with the intention of the tax legislation.

In addition, tax planning seeks to maximise the appropriate statutory tax reliefs to reduce the tax costs to the business.

External advisers are engaged to support the Group as required for ad hoc advice on complex areas of tax matters.

4. Level of risk in relation to UK taxation



Since the Group's reputation and integrity is of paramount importance and the Group does not seek to engage in tax planning which is contrary to the spirit of the tax legislation, the Group adopts a low level of risk in relation to UK taxation.

Whilst recognising that tax risk cannot be eliminated, the Group adopts a proactive approach to dealing with tax risk. This is carried out through a regular process of identification, evaluation and reporting of tax risks. This is carried out in the context of the type of taxes borne and collected by the Group and taking into account the quantum of those taxes.

5. Approach to dealing with HMRC



The Group aims to have an open and collaborative working relationship with HMRC.

The Group will seek to respond to all reasonable requests for information by HMRC in full and on a timely basis. Information will be provided through the Group CFO, or any member of Finance authorised by the Group CFO to do so.

In any interaction with the tax authority's employees are expected to behave courteously, honestly and with integrity.