

Group Tax Strategy Statement For Fiscal Year 2021

adp Gauselmann UK Limited and its subsidiaries is publishing this UK tax strategy statement pursuant to the requirements of paragraph 16 (2) of Schedule 19 of the Finance Act 2016. This statement is applicable to the tax strategy in the United Kingdom and it is publically available to all stakeholders.

1. Our risk management and governance arrangements in relation to UK taxation

The main focus of our tax strategy is to ensure that the group remains compliant with the relevant and applicable tax laws in each jurisdiction in which it operates. The submission of tax filings and remittance of tax liabilities on a timely basis forms a key part of this strategy.

The tax strategy is supported by internal control frameworks which govern the commercial operations of the group and are subject to regular reviews by the group's internal audit departments and UK Board of Directors.

Tax questions that arise are usually handled by a team of appropriately qualified in-house tax professionals based principally at the group's headquarters in Germany. The group's tax teams identify, manage and, where possible, eliminate tax risk.

Reliance is placed upon external tax advisers where there is a need for specialist and local guidance and support, for example on acquisitions and disposals. We also rely on external tax advisors in those locations where the activities of the group are insufficient to warrant a full time tax resource for more routine compliance matters.

2. The level of risk in relation to UK taxation that we are prepared to accept

We take a responsible approach to managing our tax affairs; as a group we will always comply with applicable laws and regulations in the countries in which we operate.

Our approach to tax risk follows the same principles that apply to all other business risks. We consider reputation and corporate social responsibility as well as purely financial impacts. We are particularly aware of our reputation with a wider population of stakeholders in matters related to tax, including the tax authorities.

When making decisions on tax we take into account the materiality of any item, as well as the costs of effective risk mitigation actions. Specifically, there are not predefined limits of the amount of acceptable tax risk; it is judged on an issue by issue basis.

3. Our attitude towards tax planning

Tax planning activities are subject to formal governance processes. All significant planning activity is supported by appropriate external tax advice and conducted on the basis that it does not expose the group to material financial or reputational risk. The group utilizes tax reliefs and allowances prescribed by the tax legislation in the way in which they are intended to be used. As a result, the group does not adopt positions that are expected to result in disputes with tax authorities and does not engage in artificial tax avoidance arrangements.

4. Our approach towards dealings with Her Majesty's Revenue and Customs

We engage with HMRC openly and constructively, based on mutual trust and cooperative compliance. We feel this is the best way to ensure that we pay the right tax at the right time and to maintain a good working relationship. Where appropriate and possible we endeavor to engage with HMRC on a real time basis in any areas of material uncertainty, so as to minimize our tax risk and to provide greater certainty for both parties in advance of formal tax filings.