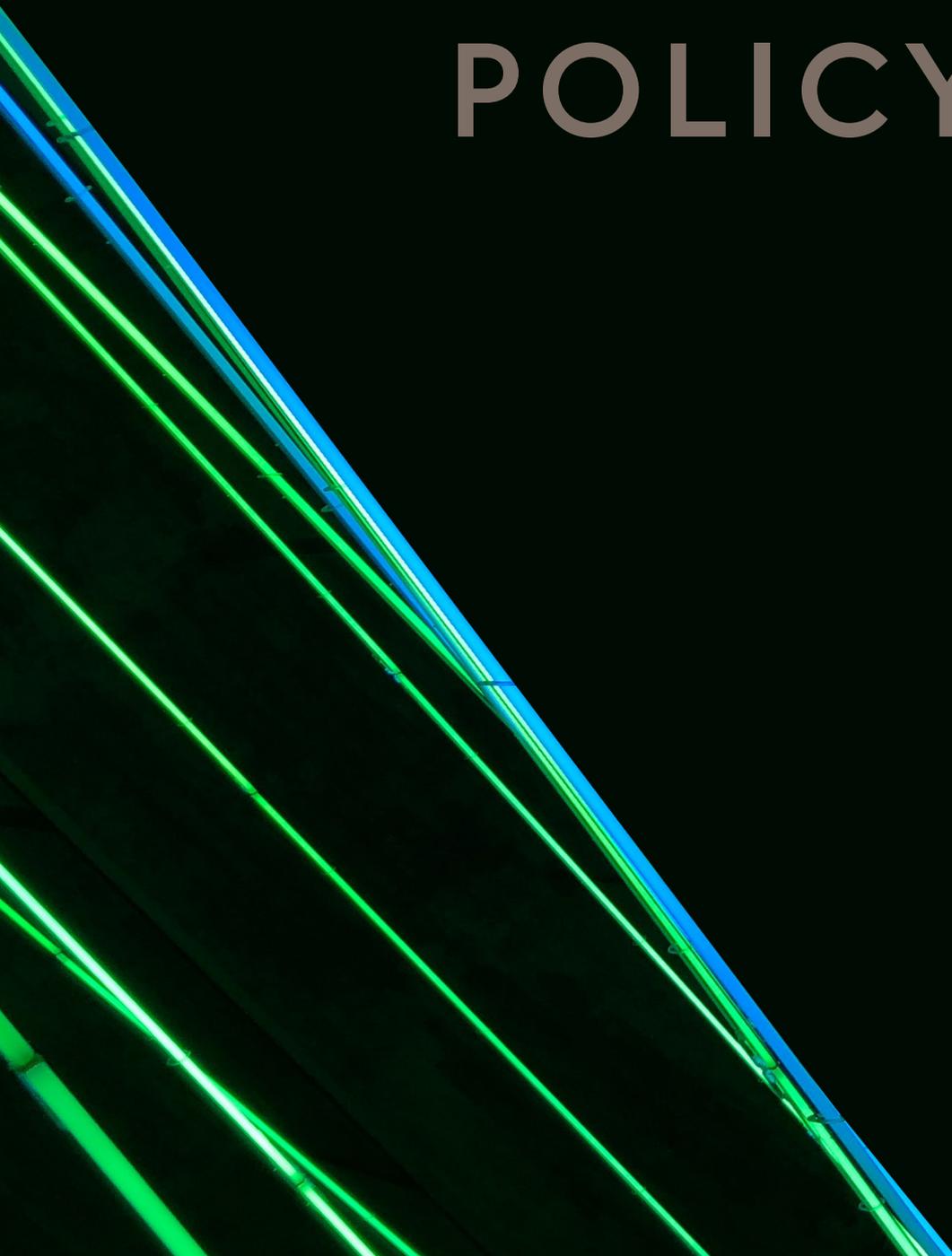


RIGBY GROUP (RG) PLC



RIGBY

# UK TAX POLICY





Rigby Group is a portfolio of family-owned and highly successful businesses operating across Europe and comprising of six key divisions: Technology, Airports, Real Estate, Hotels, Aviation and Finance. Diversifying from its origins as a principally technology-led business, Rigby Group has evolved over the last 45 years – through smart, strategic acquisitions – into a £2.9bn turnover business with over 8,500 employees.

Rigby Group has built a distinguished reputation as both an investor and business operator and the reputation of the group is paramount for the continued success of the family business. Rigby Group's client base reflects the broad cross-section of British industry with emphasis on specific sectors. Government related business also represents a significant proportion of the whole with many clients in Local and Central Government with key relationships in Healthcare, Education, Justice, Parliamentary IT delivery, Law Enforcement, and many other Government offices.

As a Group, we are determined to fulfil our responsibilities towards our key stakeholders. We ensure that all Group business is conducted to rigorous ethical, professional and legal standards. Ensuring that we pay the right amount of tax in the right place at the right time is therefore core to our commitment to being a responsible business and is aligned with the core family values of the group.

#### Tax policy: Financial year ending 31 March 2021

This policy applies to Rigby Group (RG) plc and all UK entities in its group and comprises five key elements:

##### 1. Approach to risk management and governance arrangements

We are committed to developing appropriate levels of internal governance throughout the business. This is achieved through:

- appointment of Non-Executive Director who is responsible for challenging the group on its internal governance structure;
- dedicated internal audit team who are tasked with reviewing effectiveness of controls and processes within the largest divisions of the group;
- the group tax team who have oversight of the UK tax compliance obligations of all group entities and report relevant risks to the Rigby Group board;
- external advice for significant transactions (such as acquisitions, disposals, reorganisations etc.); seeking out improvements in financial systems in order to reduce levels of tax risk where possible.

##### 2. Attitude towards tax planning

The Rigby Group structures transactions in a commercial manner that is consistent with the underlying economic substance of the transaction. The business needs of the group will be the primary driver for structuring transactions, however, consideration will be given to the tax consequences of different structures to allow the group to manage its affairs in a tax efficient manner and in order make tax relief claims and incentives where available. Due to the reputational risk and corporate responsibility views of the Rigby Group board, we have no appetite for tax motivated planning and artificial tax structures.

##### 3. Level of tax risk accepted

Risk management is a key focus of the Rigby Group board. Appetite for risk is set to balance opportunities for new business development whilst maintaining customer satisfaction and protecting the group's reputation and assets, vital to ensure the group is able to continue to deliver its strategic objectives. This risk appetite is consistent with maintaining a strong framework of ethical behaviour and compliance with laws and legislation. The senior management team of each division of the group are charged with reviewing risk and implementing and maintaining effective internal control systems with assistance from group finance and tax to mitigate identified risk across the companies they manage. These risks and controls are reported to the Rigby Group board.

##### 4. Approach to dealing with HMRC

The Group is committed to maintaining an open and honest relationship with HMRC. This is achieved through regular correspondence with the group's Customer Compliance Manager and update meetings at which HMRC are made aware of any key transactions or group changes. Appropriate levels of disclosure are included within the corporation tax filings and tax issues are communicated to HMRC as they arise.

##### 5. Approach to risk management and governance arrangements

This tax strategy document is approved, owned and overseen by the Rigby Group board. This document was approved by the board of Rigby Group (RG) plc on 22 March 2021.

Rigby Group (RG) plc regards this publication as complying with the duty under Schedule 19 of Finance Act 2016.