

ABP (Jersey) Limited and its subsidiaries – Tax Strategy

Financial year ended 31 December 2017

- **Compliance** - We comply with tax law and practice in all of the territories in which we operate, including the UK which is our main place of business. Compliance for us means paying the right amount of tax in the right place at the right time and involves disclosing all relevant facts and circumstances to the tax authorities and claiming reliefs and incentives where available.
- **Planning** - In structuring our commercial activities we will consider – among other factors – the tax laws of the countries within which we operate with a view to maximising value on a sustainable basis for our shareholders.
- **Tax risk management** - Given the scale of our business and volume of tax obligations, tax risks will inevitably arise from time to time in relation to the interpretation of tax law and nature of our compliance arrangements. In line with the Group’s risk management approach, we proactively seek to identify, evaluate, manage and monitor tax risks to ensure they remain in line with the group’s risk appetite. Where there is significant uncertainty or complexity in relation to a tax risk, external advice is sought.
- **Tax authority relationships** - We have an open and honest relationship with HMRC whose representatives we engage in a spirit of co-operative compliance. We are prepared to litigate where we disagree with a ruling or decision of a tax authority but will first seek to resolve any disputed matters through pro-active and transparent discussion and negotiation.

This strategy is approved, owned and overseen by the ABP (Jersey) Limited Board.