

PIRC Tax Policy Note

1. We consider taxation to be an important contribution to wider society rather than a cost to be minimised.
2. We will seek to pay the right amount of tax at the right time and in the right place according to the letter and the spirit of the law in each country in which we operate.
3. We will take into consideration all stakeholders when tax planning including consumers, investors, our staff and the governments and communities in the countries in which we operate.
4. *We will not structure transactions in a way that does not reflect genuine commercial activity with the intention of reducing a tax liability.*
5. *We will not have any connections with tax havens unless it is necessary for the purposes of trading within those jurisdictions.*¹
6. We will be open and fair in our negotiations with HM Revenue & Customs and any other tax authorities we deal with and will seek to discuss with them in advance how any significant transactions whose tax treatment is open to interpretation should be treated for tax purposes.
7. *We will not use marketed tax avoidance schemes or arrangements that fall foul of current regulations.* This covers (but not exclusively):
 - DOTAS
 - GAAR
 - IR35
 - EBTs
 - Disguised remuneration rules
9. We will be open and transparent in our lobbying on taxation matters and will not seek to influence government tax legislation in any way that is detrimental to our stakeholders' best interests.
10. We will monitor compliance with this policy on a regular basis and report on that compliance in our annual reports in future.

¹It can be argued that 4 and 5 are covered by 2, so they are in italics. However, given the sensitivity of the tax haven issue it may well be worth stating.