

## Apogee's Tax Strategy for 2018

### Introduction

Apogee is the largest independent managed services provider of print and document technology and outsourcing services across the UK and Europe.

This tax strategy applies Apogee Group Limited and all UK group companies and is relevant for the financial period ending 31 October 2018. Apogee Groups Code of Conduct requires that all aspects of the business shall be conducted with honesty, integrity and transparency and this is imbedded within the Groups taxation strategy.

Apogee Group considers the publication of this strategy as complying with its obligations of paragraph 16(2) Schedule 19 Finance Act 2016.

This document has been approved by the Board of Directors of Apogee Group.

### Approach to risk management and governance arrangements

Apogee Group aims to ensure that all tax reporting is transparent, justifiable to the relevant taxation authorities and aligned with the Group's overall business strategy.

Corporation tax compliance for all entities in the Group is dealt with by external advisors but all other taxes are dealt with by the UK finance team. However, guidance and support on technical matters in all areas of tax is always sort from external qualified advisors outside of the Group where tax law is unclear or subject to interpretation.

Apogee Group's appetite for tax risk is low. The UK finance team are responsible for the identification, prioritisation and monitoring of tax risk across the UK business. Any identified issues are then escalated to the Group Finance Director who would then review and escalate to the board of directors. The UK board of directors provides an oversight in ensuring that tax is considered within the wider context of the business.

Apogee Group fall within the Senior Accounting Officer regime in the period which ensures that the Group establish and maintain appropriate tax accounting arrangements. The Senior Accounting Officer must therefore take reasonable steps to monitor the accounting arrangements of the company and identify any respects in which those arrangements are not appropriate tax accounting arrangements.

### Attitude towards tax planning

Apogee Group aim to manage their tax affairs efficiently and this is done by seeking advice from external advisors. Any decisions made in regards to tax planning strategies is agreed at board level.

Within the UK we utilise all available reliefs to reduce the tax costs of our business activities and will always seek external advice on the reliefs the Group are able to take advantage of in any given tax year. These reliefs are applied in the manner in which HMRC intended them to be used.

Where the entities within the Apogee Group carry out transactions with each other, we ensure that these are undertaken at arm's-length.

## Relationship with HMRC

It is Apogee Group's aim to be transparent and proactive in our dealings with HMRC through regular communications with them wherever necessary. All dealings with HMRC are dealt with in a professional manner which is in line with the Groups Code of Conduct.

We appreciate that there will always be areas of differing interpretation of the tax legislation between ourselves and HMRC but whenever this occurs we would engage in a discussion with HMRC and our external advisors to resolve the matter promptly.

In the event of any investigation from HMRC, all entities within the Apogee Group will cooperate fully to ensure that the investigation is dealt with in a timely manner.



**Martin Randall**  
Group Finance Director