

Tax Strategy

Scope

This strategy applies to Shintoa (UK) Ltd. in accordance with paragraph 19 of Schedule 19 to the Finance Act 2016. In this strategy, references to 'Shintoa' refer to Shintoa (UK) Ltd. The strategy has been published in accordance with paragraph 16(4) of the Schedule.

This strategy applies from the date of publication until it is superseded. References to 'UK Taxation' are to the taxes and duties set out in paragraph 15(1) of the Schedule which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Land Tax. References to 'tax', 'taxes' or 'taxation' are to UK taxation and to all corresponding worldwide taxes and similar duties in respect of which the company has legal responsibilities.

Aim

Shintoa is committed to full compliance with all statutory obligations and full disclosure to relevant tax authorities. The company's tax affairs are managed in a way which takes into account the company's wider corporate reputation in line with Shintoa's overall high standards of governance.

Governance in relation to UK taxation

- Ultimate responsibility for Shintoa's tax strategy and compliance rests with the Board of Shintoa (UK) Ltd.;
- The Managing Director ('MD') is the Board member with executive responsibility for tax matters;
- Day-to-day management of Shintoa's tax affairs is delegated to the Finance & Accounting Manager, who reports to the MD;
- The Finance team is staffed with appropriately qualified individuals;
- The Board ensures that Shintoa's tax strategy is one of the factors considered in all investments and significant business decisions taken.

Risk Management

- Shintoa operates a system of tax risk assessment and controls as a part of company's financial reporting system;
- Shintoa seeks to reduce the level of tax risk arising from its operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations;
- For each tax there is a process in place to identify key risks and put mitigating controls in place. These key risks are monitored for business and legislative changes which may impact them and changes to processes or controls are made when required;
- Appropriate training is carried out for staff who manage or process matters which have tax implications;
- Corporate tax and employment tax compliance is outsourced to external advisers and additional tax advice is sought where appropriate.

Attitude towards tax planning and level of risk

Shintoa manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax.

When entering into commercial transactions, Shintoa seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation. Shintoa does not undertake tax planning unrelated to such commercial transactions.

The level of risk which Shintoa accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the company's tax affairs. At all times Shintoa seeks to comply fully with its regulatory and other obligations and to act in a way which upholds its reputation as a responsible corporate citizen. In relation to any specific issue or transaction, the Board is ultimately responsible for identifying the risks, including tax risks, which need to be addressed and for determining what actions should be taken to manage those risks, having regard to the materiality of the amounts and obligations in question.

Relationship with HMRC

Shintoa ensures that HMRC is kept aware of significant transactions and changes in the business and seeks to discuss any tax issues arising at an early stage. When submitting tax computations and returns to HMRC, Shintoa discloses all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain.

Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.

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