

Accord Healthcare Ltd – Tax Policy

This Tax Policy applies to Accord Healthcare Ltd (“Accord”) and its wholly owned UK subsidiaries.

This Tax Policy sets out Accord’s approach to tax in relation to its UK activities. It has been prepared in accordance with Schedule 19 of Finance Act 2016 in respect of the financial year ended 31 March 2021 and has been approved by the Board of Directors.

Our culture and values

At Accord, we are driven by our values and principles. Integrity is an important part of who we are. We conduct business in a way that is fair and ethical, and complies with all applicable laws and regulations. We believe that honesty and professionalism are fundamental to our business. Our culture is fully reflected in this Tax Policy.

As mandated by Accord’s Board of Directors, we seek to comply fully with all applicable laws and best practice in relation to dealings with healthcare professionals and government officials and to comply fully with the highest standards of business and ethical conduct in all our dealings with customers, suppliers, competitors and other business partners.

Our approach to the management of tax

The Finance Department has a responsibility to manage Accord’s tax position in a way that:

- Reduces the risk of tax errors that may result in financial costs or reputational damage through the maintenance of a governance framework.
- Complies with relevant tax laws and allows us to act with integrity in all our dealings with HMRC.
- Manages business costs and risks through the appropriate use of legitimate tax planning.

Tax planning

Tax planning is a legitimate activity, which Accord should engage in to protect the value of our investments and manage the costs of any taxes to the business.

Accord will only engage in tax planning that supports our legitimate commercial activities and our approach to tax planning reflects our core values. Accord does not use marketed tax avoidance schemes or conduct any artificial tax planning. Accord may seek to utilise government enacted tax reliefs where appropriate.

Tax risk and governance

Accord accepts that tax risk is inherent in doing business and needs to be managed appropriately. We do this through adhering to the Accord’s risk management policies and methodologies to ensure that emerging tax risks across all activities are identified, assessed, managed, and reported where appropriate to Accord’s senior management, including the Board of Directors.

Where new tax risks emerge, these are assessed by the Finance Department to ensure that they are in line with the Accord’s attitude to risk. The Finance Department ensures that there are effective controls in place around all significant tax processes and operations, with adherence to these controls monitored and reported to senior management on a regular basis.

Accord values the experience of professional tax consultants and regularly seeks tax advice from reputable external advisors where it is required. Accord complies with all legally required disclosure obligations.

Tax compliance and interaction with HMRC

At Accord, we take our tax obligations seriously and seek to meet all our tax compliance and disclosure requirements. If a dispute were to arise, Accord would seek advice from external advisors, and actively engage with HMRC to expedite an efficient resolution.

Accord aims to have a professional and cooperative relationship with HMRC, also consulting with HMRC as required on the interpretation of the relevant tax law.

Approved by Accord Healthcare Limited Board of Directors on 27 November 20