

## Introduction

This document sets out the tax strategy agreed by the Board of FM Conway in conducting its tax affairs and dealing with tax risks. This strategy applies for the year ending 31 March 2024 and will be reviewed by the Board on an annual basis. For the purposes of this policy, tax is defined as all financial charges or levies (direct and indirect) including corporate income tax, VAT, payroll taxes, stamp duty and other taxes applied by a Tax Authority. It is being published in compliance with the UK Finance Act 2016 with respect to its duties under Section 161 and paragraph 16(2) of Schedule 19 of the Act.

## Tax Strategy

FM Conway (“The Group”) is a leading infrastructure services provider delivering vital services in transportation, the built environment and open spaces for communities and business. Through its self-delivery model and combining its in-house Professional Service team with front-line operational excellence, it inspects, designs, builds, produces, enhances and maintains essential infrastructure services for the community.

Our overarching guiding tax principle is to pay the right and proper amount of tax, in the right place at the right time.

The Group operates solely in the UK but will often transact with suppliers in overseas territories. Its tax strategy is underpinned by the following principles:

- To comply with all applicable tax laws, rules and regulations;
- To manage its tax affairs with the utmost care and professionalism; always ensuring there is a strong tax governance framework in place;
- To adopt an open and transparent approach to dealing with tax authorities seeking to resolve issues in a constructive and cooperative manner; and
- To avoid aggressive tax planning or participation in artificial tax avoidance schemes.

## Risk Management and Governance

The Board has ultimate responsibility for the Group’s tax matters, with day-to-day management overseen by the Chief Financial Officer and the finance team. The Chief Financial Officer will engage with external tax advisers to review processes and controls monitoring tax compliance and tax risks, and to ensure the Group remains compliant with legislation. Tax risks are identified by the Finance team working in conjunction with external advisers. If a tax risk is identified a member of the Finance team will take responsibility for ensuring there are appropriate processes and controls in place to mitigate any exposure and to ensure it is correctly reported both internally and externally as required.

The Senior Accounting Officer (“SAO”) is responsible for submitting the annual statement of compliance to HMRC and ensuring that the accounting systems and processes are fit for purpose.

The Chief Financial Officer is the SAO for FM Conway Ltd and its subsidiaries with the exception of Toppesfield Ltd.

The Toppesfield Ltd Finance Director is the SAO of the company.

## Tax Planning

The Group will engage in tax planning providing it is permitted by law and has sought independent external advice. It does not undertake aggressive tax planning or participate in artificial schemes. Tax planning is only ever based on commercial and economic substance and will have regard to the potential impact on reputation and business objectives.

The Group will use incentives and reliefs to minimise the tax costs of conducting its business activities, but will not use them for purposes which are knowingly contradictory to the intent of the legislation.

## Tax Risk

The Group takes a responsible and balanced approach to maintaining its tax affairs and the level of risks it is prepared to accept. This is consistent with the approach to tax risk management and governance and the Board’s attitude to tax planning.

## Engaging with HMRC

The Group seeks to adopt an open, transparent and collaborative approach to dealing with HMRC. It aims to respond to queries promptly and to work to resolve issues quickly where practicable.

Approved by the Board: 23<sup>rd</sup> May 2023