

Introduction

Equiniti is an intelligent provider of sophisticated technology, administration, processing and payments services, delivered by over 5,000 employees worldwide. Our mission is making complex things simple for organisations and individuals alike.

We are a values-led organisation, aligned with the expectations of our clients, investors, employees, suppliers, communities, regulators and society as a whole. We take corporate governance seriously and are committed to being a responsible business.

This tax strategy is published in accordance with the relevant provisions of Schedule 19 of Finance Act 2016 and is relevant for the year ended 31 December 2021.

Equiniti regard this publication as complying with the duties set out under paragraph 16 (2) of that Schedule.

This tax strategy was approved by the Board of Equiniti Group plc on 9 November 2021.

Aim

The group's tax affairs are managed to be consistent with our wider corporate reputation and in line with Equiniti's overall high standards of governance.

Equiniti is committed to full compliance with the applicable laws and regulations in the countries in which it operates, to mitigate inherent tax risks and to enhance and protect its reputation.

Our tax strategy comprises four key components.

Approach of the group to risk management and governance arrangements in relation to tax

The Board has overall responsibility for taxes, including this tax strategy.

Executive responsibility for tax matters is delegated to the Chief Financial Officer. Day-to-day management of Equiniti's tax affairs is delegated to the Director of Tax.

The Audit and Risk Committees requirements to monitor the integrity of Equiniti's financial and reporting system, internal controls and risk management framework, expressly includes those elements relating to taxation.

In accordance with UK rules, Equiniti nominates a Senior Accounting Officer (SAO) for each of its UK companies. The SAO ensures that processes of tax compliance are carried out correctly and liaises with the Director of Tax about tax risks and controls to mitigate those risks.

The Director of Tax oversees all compliance obligations and actively monitors and manages risks together with the wider business and commercial teams.

The wider group finance team are sufficiently trained and qualified and have the necessary skill and experience to apply the approach set out in this strategy.

Key risks and issues are escalated to the Board, Audit and Risk Committees on a regular basis as appropriate.



Attitude of the group towards tax planning

It is recognised that Equiniti has a responsibility to pay an appropriate amount of taxes in each of the jurisdictions in which it operates, and Equiniti is committed to doing so in a timely manner.

This is balanced with the overarching objective to derive sustainable economic value from the business activities of the group.

Where applicable Equiniti will seek to utilise tax incentives and reliefs which are statutorily available, e.g. Research & Development Expenditure Credits.

Equiniti does not participate in any marketed tax avoidance schemes or any arrangements which have no commercial basis.

Advice may be sought from external tax advisers to support the in-house team in evaluating risk areas, adhering to complex tax laws and implementing best practice.

Level of risk in relation to taxation that the group is prepared to accept

Equiniti is committed to ensuring the integrity of all reported tax numbers and seeks to comply fully with its regulatory and other obligations, acting in a way which is consistent with our core values and principles.

Equiniti monitors changes to tax legislation in the territories in which it operates and will make, where necessary, changes to internal tax processes as a result of these.

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.

The approach of the group toward dealings with Tax Authorities

Equiniti engages with tax authorities constructively, honestly and in a timely manner. We will seek to resolve any disputed matters through active and transparent engagement.

As the Group is a large business, in the UK HMRC appoints a Customer Compliance Manager (CCM) to co-ordinate HMRC's risk assessment and intervention activities.

The Group is in regular contact with the CCM and the dedicated team that HMRC has appointed in the UK with specialists in corporate tax, employment taxes and VAT.

We update HMRC on a regular basis about developments in the business and we aim to supply any information it may require on a full and timely basis.

We adopt the same approach in the overseas markets we serve.