

Independent Clinical Services Tax Strategy

Independent Clinical Services (“ICS” or “The Group”) is a leading provider of health, life sciences and social care staffing and services to the UK health sector.

This document has been approved by the Board for publication and sets out Independent Clinical Services’ policy and approach to conducting its tax affairs and dealing with tax risk. This Tax Strategy applies to all UK entities in the Group. Publication complies with the requirements of Finance Act 2016 Schedule 19, paragraph 16 (2). The strategy will be reviewed annually and any amendments will be approved by the Board.

Tax risk management and governance arrangements in the United Kingdom

The Board member with executive responsibility for tax matters is the Chief Financial Officer, who is also the Senior Accounting Officer (SAO) under UK tax legislation. The main duty of the SAO is to take reasonable steps to ensure that the Group establishes and maintains appropriate UK tax compliance arrangements. The Group is subject to various different UK taxes which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Tax. The SAO delegates managements of these taxes to appropriately qualified and experienced employees. The Group maintains appropriate tax accounting arrangements by putting controls in place to reduce the risk of non-compliance or misstatement of the Group’s tax liabilities.

The SAO and his delegates identify and manage UK tax risks using their knowledge of the Group’s operations and UK tax legislation. They do this through:

- Regular communication with finance and other relevant operational staff within the UK businesses to keep informed of any significant business changes;
- Involvement in all acquisitions including review of financial and tax due diligence reports into the target’s business;
- Monitoring proposed changes in UK tax legislation to identify its potential impact for the UK group;
- Consultation with reputable external tax advisors regarding all tax matters.

The Board’s Audit Committee also includes taxation within its remit to monitor the effectiveness of internal financial controls, the external audit process and internal & external financial risks.

Attitude toward tax planning and level of tax risk

The Group believes it is important to plan its business operations so that it can comply with UK and foreign tax obligations and believes it is important to consider the tax consequences of significant transactions before carrying them out.

External tax advisors are consulted on the tax consequences of potential transactions including acquisitions and restructuring. They advise on tax planning, advise on tax risk, and offer expertise on recent or pending changes in relevant tax legislation to ensure compliance with all relevant laws, rules, regulations, and reporting and disclosure requirements.

The attitude to tax planning of the Group is to ensure that ICS complies efficiently with all legal requirements. However, there is always a level of taxation risk due to:

- the complexity of taxes including frequent changes in tax law;
- the scope for disagreement over the interpretation of laws meaning that tax authorities may take a different view of the application of legislation; and
- the variety and volume of different taxes that affect the Group’s activities.

Where there is uncertainty or complexity, external advice will be sought.

Interaction with HMRC

The Group is in regular contact with HMRC, both directly and through external advisors. We have an open and transparent approach to dealing with HMRC and in particular commit to:

- adopt a proactive and collaborative professional relationships with HMRC;
- make fair, accurate and timely disclosure in correspondence and returns, and respond to queries and information requests in a timely fashion;
- seek to resolve issues with HMRC in real time, and where disagreements or uncertain positions arise, work with HMRC to resolve them.