

The Boparan Restaurant Group Tax Strategy 2020

The tax strategy is approved by the board of Invest Co 1 Limited and sets out the group's general tax arrangements as well as the policy and approach to tax risk management, attitude to tax planning and working with HMRC.

The publication of this tax strategy statement is regarded as satisfying the statutory obligation under Para 16(2), Schedule 19 of the Finance Act 2016 for the year ended 31 December 2020.

This tax strategy is reviewed annually.

References to 'UK taxation' are to the taxes and duties in the UK which include:

- All corporate income taxes
- Indirect taxes (VAT, Stamp Duty Land Tax)
- Employment taxes (PAYE / National Insurance / Construction Industry Scheme)
- Other applicable tax matters
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Approach to risk management and governance arrangements

Invest Co 1 Limited and its subsidiaries are committed to complying with UK tax obligations and considers compliance to mean paying the right amount of tax at the right time, completing accurate returns whilst also recognising available legislative concessions and reliefs.

Attitude towards tax planning

When considering the structure of our commercial activities, we take account of a number of factors including consideration of the tax laws. We do not take an unreasonable stance on our interpretation of tax legislation and we strive to work within both the letter and spirit of tax legislation. We do not engage in aggressive tax planning and do not participate in artificial tax avoidance schemes to reduce our UK tax liability.

Level of risk Invest Co 1 Limited and its subsidiaries are prepared to accept.

The increasing complexity and requirements of the UK tax legislation means that inevitably risks will arise. We ensure that where risks do arise, they are identified, evaluated and managed proactively. For certain transactions where there is a material level of uncertainty or complexity, we will seek external advice to help reduce risk. Invest Co 1 Limited does not engage in artificial tax arrangements.

Relationship with HMRC

It is Invest Co 1 Limited's policy to be transparent and proactive in all interactions with HMRC through regular meetings and communication and are committed to prompt disclosure and transparency in all tax matters with HMRC. It is recognised that there will be areas of differing legal interpretations between ourselves and HMRC and where this occurs we will engage in proactive discussion to bring matters to as rapid a conclusion as possible. Any inadvertent errors in submission of tax returns and tax computations to HMRC are fully disclosed as soon as reasonably practicable after they have been identified.