

On Assignment UK Limited
Year ending 31 December 2017
UK Sub-group - Tax Strategy

This document sets out the UK Sub-group Tax Strategy of On Assignment Limited, head in relation to the UK Sub-group, in compliance with section 161 and section 19 (2) of Schedule 19 Finance Act 2016 [‘the Schedule’] for the year ending 31 December 2017.

The following companies are members of the UK Sub-group for the purposes of this Tax Strategy:

- On Assignment Limited (‘head’)
- Lab Support UK Limited
- Sharpstream Holdings Limited
- Sharpstream Life Sciences Limited

All references to the ‘UK Sub-group’ henceforth are a reference to the above companies.

This Tax Strategy applies to all UK taxes as set out in s15 (1) of Schedule 19 Finance Act 2016 and any reference to ‘tax’, ‘taxes’, or ‘taxation’ are to all taxes as defined within. This Tax Strategy will be owned by the Board of Directors (‘Board’) and will be reviewed annually with any proposed amendments ultimately discussed and approved by the Board.

In accordance with the Schedule, this tax strategy is available on www.labsupport.co.uk

The Board is responsible for ensuring there is an appropriate framework for the implementation of the Tax Strategy and oversight of the identification and management of tax risk. The Board maintains responsibility for implementing new controls where material tax risks are identified.

The Board is supported by finance and tax teams who have responsibility for implementing the Tax Strategy and reporting back to the Board. A number of tax sensitive processes are performed within the finance and tax teams and each relevant individual is responsible and accountable for meeting their tax obligations, controls and policies as issued by the Board. Performance of the finance and tax teams, is reportable to the Vice President of Tax who in turn reports up to the Board.

This Tax Strategy was approved for publication by the Board on 21st December 2017 and applies thereafter until it is superseded.

Background

The principle activity of the UK Sub-group is professional staffing services offered to clients in the Life Science, food and IT sectors.

The client base are leaders in their field requiring temporary staffing solutions to meet on-going or seasonal human resources requirements. These relationships are performed in adherence to all UK tax legislation. The group also retains the services of suitable tax advisors to offer guidance and support to ensure compliance.

Tax objectives

The Board’s objectives are to support the implementation of the Tax Strategy in order to meet the following overall policies in relation to tax:

- Implementing and maintaining controls and procedures relating to all taxes;

- Ensure compliance with all legal requirements and to make all appropriate tax returns and tax payments within deadlines;
- Forecasting and planning tax cash payments accurately;
- Seek to utilise available tax reliefs and incentives where available in a manner which is consistent with the Government's policy objectives;
- Ensuring that any transactions undertaken to grow the UK Sub-group are effected tax efficiently in accordance with all relevant UK tax law and legislation;
- Avoiding a risk of material tax exposure in respect of any transaction in which the UK Sub-group is involved;
- Provide support and training to those employees who have responsibilities with regards to tax;
- Co-operate fully and transparently when dealing with HMRC; and
- Consider and manage tax risks in order to maintain a strong reputation and brand.

Approach to risk management and governance in relation to UK tax

The UK Sub-group is committed to ensuring that its tax affairs are open, transparent and compliant with tax legislation.

The UK Sub-group internal structure is set up to ensure:

- The Board understand the importance of tax compliance, and how it is achieved;
- There is a constant dialogue between the Board and those individuals tasked with the operation of the finance and tax function; and
- The UK Sub-group portrays a positive view towards tax compliance and the importance of meeting its obligations.

Tax compliance issues are monitored in line with related deadlines and trigger events regularly and where the tax treatment of certain items is uncertain, external advisers are engaged to provide expert advice.

The Board has established that the following principles will form the basis of management's philosophy and the Tax Strategy to achieve the vision of compliance and governance with respect to tax:

- Good governance: The UK Sub-group seeks to comply with all relevant tax legislation;
- Internal control: Implement a system of internal controls in order to minimise tax risk;
- Documentation: Ensure that agreed tax processes are documented in order to mitigate the risk of error;
- Training: Investing in training for those staff tasked with tax compliance and governance;
- External advice: Seeking specialist external tax advice where required.

Tax planning

The UK Sub-group does not support or engage in aggressive or artificial tax planning, the sole purpose for which would be to avoid or obtain a tax advantage. The UK Sub-group undertakes tax decisions and planning as part of its overall business strategy and engages the services of professional advisers to assist with major or complex business decisions in order to understand any associated tax risks and ensure full compliance with local tax laws and regulations.

The UK Sub-group seeks to ensure that transactions are structured such that any tax reliefs or incentives available are realised in line with the intended tax legislation and only where there is a credible technical standing.

Attitude towards risk

The Board's on-going tax risk approach is based on principles of reasonable care and materiality. Each tax risk is measured based on a balance of impact (both financial and non-financial) of that risk and the likelihood that it will materialise. Risks identified are then communicated down to the finance and tax teams in order that they may be appropriately managed.

There is no one level of risk that the UK Sub-group is prepared to accept but each is considered on a case by case basis having taken into consideration all available facts and information. The UK Sub-group has close relationships with professional advisers that allows it to seek expert advice where necessary which in turn aids compliance.

The UK Sub-group is conscious of the potential adverse publicity that a negative tax attitude can bring and seeks to minimise any reputational damage through the actions set out in this Tax Strategy.

Relationship with HMRC

The UK Sub-group is committed to the principles of openness and transparency in its approach to dealing with HMRC. In line with HMRC's consultation on 'Improving Large Business Tax Compliance' the UK Sub-group aims to:

- Promote a professional and collaborative relationship which is based on principles of transparency and justified trust;
- Make fair, accurate and timely disclosure in correspondence and returns, and respond to queries and information requests openly and honestly in a timely fashion;
- Resolve issues with HMRC in a timely manner, and where disagreements arise work with HMRC to resolve issues by agreement where possible;
- Ensure all interactions with HMRC are conducted in an open, collaborative and professional manner; and
- Disclose and correct any inadvertent errors as soon as is reasonably practical and implement controls to ensure future compliance.