

## Tax Strategy

TClarke plc and its subsidiaries ('the Group') is a nationwide building services contractor delivering the full range of mechanical, electrical and ICT services, covering the whole lifecycle of the building from design through construction to lifetime maintenance. Our focus is on being the partner of choice in each of the specialist areas we work in and equally on the retention and enhancement of our traditional reputation for delivering good value, total trustworthiness and excellent work quality. This focus on openness, trust and quality extends to our tax affairs.

### Our approach

The Group is committed to managing its tax affairs in a responsible and transparent manner complying with all relevant tax legislation, having due regard to our wider reputation and corporate responsibilities.

Our approach to tax has been built around the requirements detailed at paragraph 19(2) of Schedule 19 of the Finance Act 2016 and is applicable for the financial year ended 31 December 2023.

Through our business activities we pay a range of taxes, including corporation tax on Group profits, employment taxes, and other taxes such as business rates and stamp duty. We also collect and pay employee taxes, construction industry taxes and VAT.

The Group currently only operates in the UK, and therefore all of its taxation liabilities are UK based.

### Governance and Risk Management

The Group seeks to ensure a consistent and robust approach is adopted to managing its tax affairs across all its businesses. This is supported by the Group's Ethical Code of Conduct which requires that all employees conduct themselves in a fair, proper and ethical manner and in compliance with applicable law, regulations and professional standards.

The Board is ultimately responsible for tax governance, and ensuring that there is an appropriate framework for the implementation and oversight of the identification and management of tax risk.

The Board has delegated day to day responsibility for the Group's tax affairs to the Finance Director, who reports to the Board as required. The Finance Director is also the Group's Senior Accounting Officer and ensures that all staff involved in the Group's tax processes receive appropriate training in the tax related aspects of their roles.

The Group's accounting software is utilised consistently across the Group and is regularly updated to ensure ongoing compliance with HMRC requirements.

### Tax risk

The Group has a low appetite for tax risk. Our primary objective is to comply with tax legislation and regulations. The Group seeks to reduce the level of tax risk arising from its operations as far as is reasonably practicable as part of its internal control processes.

Any significant tax risks arising from the Group's operations are escalated to the Finance Director for resolution. Where appropriate these risks are recorded in the Group's risk registers and monitored by the Board. The Group uses external advisers to assist in determining the appropriate tax treatment of particular transactions where necessary to ensure compliance with relevant laws and regulations.

# TClarke

## **Tax planning**

The Group will only engage in tax planning that supports the commercial and economic activity of the business. We do not engage in any artificial tax arrangements or planning but do seek to take advantage of legitimate tax incentives and reliefs where they are available, for example Research and Development tax credits.

## **Relationship with Tax Authorities**

The Group seeks to have a transparent and constructive relationship with HMRC. We work collaboratively with the tax authorities in respect of any tax audits. We seek to apply internal policies and procedures to ensure that all tax returns are completed accurately and submitted on a timely basis, and that the correct amounts of tax are paid to the authorities at the appropriate time.

## **Approval**

This strategy was formally approved by the Board at its meeting on 29th November 2023 and is reviewed annually.