

## **Edwardian Hotel London - Tax Strategy**

### **Scope**

This strategy applies to Edwardian Group Limited and to the group of companies headed by Edwardian Group Limited (the 'Edwardian Hotel Group') in accordance with paragraph 19 of Schedule 19 to the Finance Act 2016. A list of the entities to which it applies is set out below. In this strategy, references to 'Edwardian Group Limited', 'the firm' or 'the group' are to all these entities. This tax strategy was published on 24<sup>th</sup> May 2019 and the group regards this publication as complying with its duty under paragraph 16(2) Schedule 19 FA 2016 in its financial year ended 31 December 2019.

This strategy applies from the date of publication until it is superseded. References to 'UK Taxation' are to the taxes and duties set out in paragraph 15(1) of the Schedule which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Land Tax. References to 'tax', 'taxes' or 'taxation' are to UK taxation and to all corresponding worldwide taxes and similar duties in respect of which the Group has legal responsibilities.

### **Aim**

Edwardian Group Limited is committed to full compliance with all statutory obligations and full disclosure to relevant tax authorities. The group's tax affairs are managed in a way which takes into account the group's wider corporate reputation in line with Edwardian Group Limited's overall high standards of governance.

### **Governance in relation to UK taxation**

- Ultimate responsibility for Edwardian Group Limited's tax strategy and compliance rests with the Board of Edwardian Group Limited;
- Executive management of the group is delegated by the Board to Vijay Wason (Company Secretary) and Ramkumar Narayanasamy (Corporate Financial Fluency Director).
- The Board take executive responsibility for tax matters guided by Vijay and Ramkumar who are also responsible for ensuring board decisions are communicated to the group and followed out.
- Day-to-day management of Edwardian Group Limited's tax affairs is delegated to the Company Secretary.
- The Edwardian Group Limited finance team is staffed with appropriately qualified individuals. Professional tax advisors are consulted where appropriate.
- The Board ensures that Edwardian Group Limited's tax strategy is one of the factors considered in all investments and significant business decisions taken;

### **Risk Management**

- Edwardian Group Limited adopts a conservative position with regards to its tax affairs.
- Edwardian Group Limited operates a system of tax risk assessment and controls as a component of the overall internal control framework applicable to the group's financial reporting system;
- Edwardian Group Limited seeks to reduce the level of tax risk arising from its operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations;

- Processes relating to different taxes are allocated to appropriate process owners, who carry out a review of activities and processes to identify key risks and mitigating controls in place. These key risks are monitored for business and legislative changes which may impact them and changes to processes or controls are made when required;
- Appropriate training is carried out for staff who manage or process matters which have tax implications;
- Advice is sought from external advisers where appropriate.

### **Attitude towards tax planning and level of risk**

Edwardian Group Limited manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax.

When entering into commercial transactions, Edwardian Group Limited seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation. Edwardian Group Limited does not undertake tax planning unrelated to such commercial transactions.

The level of risk which Edwardian Group Limited accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the group's tax affairs. At all times Edwardian Group Limited seeks to comply fully with its regulatory and other obligations and to act in a way which upholds its reputation as a responsible corporate citizen. 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.

### **Relationship with HMRC**

Edwardian Group Limited seeks to have a transparent and constructive relationship with HMRC.

Edwardian Group Limited ensures all tax returns are filed on time to meet the required HMRC filing date. When submitting tax computations and returns to HMRC, Edwardian Group Limited discloses all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain. If there were to be a significant change in the business the group would look to seek to discuss with HMRC any tax issues arising at an early stage.

Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.

### **List of entities covered by this Tax Strategy**

Alexandrian Hotels Limited  
 Clefffield Limited  
 Dicetask Limited  
 Edwardian Bloomsbury Street Limited  
 Edwardian Canary Wharf Hotel Limited  
 Edwardian Exclusive Hotels Ltd  
 Edwardian Exclusive Ltd  
 Edwardian Finance Ltd  
 Edwardian Free Trade Hall Ltd  
 Edwardian Grafton Hotel Ltd

Edwardian Hampshire Hotels Ltd  
Edwardian Hotel Finance Ltd  
Edwardian Hotel Investments Ltd  
Edwardian Hotels Limited  
Edwardian International Hotels Limited  
Edwardian Investments Ltd  
Edwardian London Limited  
Edwardian London Management Services Limited  
Edwardian Management Services Limited  
Edwardian Ltd  
Edwardian Group Limited  
Edwardian Mercer Street Ltd  
Edwardian New Finance Limited  
Edwardian New Providence Wharf Limited  
Edwardian Pastoria Hotels Ltd  
Edwardian Sussex Limited  
Edwardian Theatre Royale Ltd  
Edwardian Vanderbilt Limited  
Heathrow Edwardian Hotel Ltd  
Hospitality Interactive Limited  
London Mayfair Hotel Limited  
London Mayfair Trademark Limited  
Old May Fair Limited  
Vanderbilt Hotels Limited