



## Optivo Tax Strategy

### Introduction

This document sets out Optivo's approach to risk management and governance as it relates to all relevant areas of tax. Predominantly this will be:

- VAT
- Corporation Tax
- Stamp Duty Land Tax
- Employee taxes including National Insurance
- Construction Industry Scheme
- Annual Tax on Enveloped Dwellings

Our strategy is in accordance with Paragraph 16(2), Schedule 19 of the Finance Act 2016 and details our commitment to the following objectives:-

- To ensure we act in accordance with all laws and regulations relating to our activities that are subject to tax.
- To ensure that our tax strategy is consistent with Optivo's overall company strategy
- To act with integrity and diligence in the management of our tax risks. To ensure that our governance of tax is appropriate and consistent.
- To minimise the cost of tax for Optivo while ensuring that we interpret the use of reliefs in a manner not knowingly contradictory to the intent of relevant legislation.
- To maintain an open and honest relationship with all relevant tax authorities based on collaboration and integrity.
- To ensure that we manage our tax affairs in such a way that they do not jeopardise the security of our residents, our staff or the business itself.

Optivo's tax strategy details our approach to the areas of tax planning, governance, tax risk management and working with HMRC.



The Tax Strategy applies to all companies that form the Optivo Group:-

Optivo	Optivo Development Services Ltd
Lamborn Estates Ltd	Crystal Palace Housing Association Ltd
The Fresh Visions People Ltd	Optivo Homes Ltd
Charity of Julia Spicer for Almshouses	Eason Gruaz Homes
Optivo Finance plc	Middlesex First Ltd
Amicus Group Ltd	Linden (Rainham) LLP (Joint Venture with Galliford Try Homes Ltd)

Optivo, Amicus Group Ltd and Middlesex First are registered with HMRC as exempt charities for tax purposes.

We'll review and update this strategy every 18 months – 2 years.

### **Tax Planning**

We aim to be tax efficient, taking advantage of tax reliefs where appropriate whilst complying with laws and regulations. But our reputation is important to us. We will try to balance the effect of different taxes to optimise our tax position. We will not attempt to create artificial tax arrangements where we feel these are inappropriate even if they could be considered legal.

We will seek external advice from professional tax consultants to ensure we apply any arrangements correctly and meet our legal obligations with regard to tax.

### **Responsibilities and Tax Governance**

The Board of Directors of Optivo (“the Board”) is responsible for setting and monitoring the strategic direction of the Group. The Group’s tax strategy is to support the delivery of its strategic objectives by organising its tax affairs in a legally compliant, responsible and efficient manner. The Board has overall responsibility for Optivo’s tax affairs. Optivo’s Chief Financial Officer (“CFO”) is accountable to the Board. Tax management is the remit of the Financial Services team for which the CFO is responsible. Responsibility for oversight of the management of tax risk sits with the Director of Financial Services and the Head of Transactions. Optivo has various boards and committees to oversee operational performance and ensure accountability.



## **Tax Risk Management**

We take a low risk approach to managing our tax affairs. We'll consider the following risks when making decisions around tax:-

### **Transaction Risks**

We'll give proper consideration before entering into any commercial arrangements where tax is a risk factor. We will seek external advice from professional tax consultants to ensure we apply any arrangements correctly and meet our legal obligations with regard to tax.

### **Operational Risks**

We'll ensure those staff responsible for managing tax risk are suitably trained to understand tax and have the support of senior management when reviewing decisions on tax. We'll carry out regular reviews of our tax function through our Internal Audit function.

### **Compliance Risks**

We'll adhere to HMRC's requirements for meeting our obligations to file returns. We have specific software for filing VAT returns digitally and use HMRC's online portal for filing CIS returns. We use external tax consultants or solicitors for preparing and submitting Corporation Tax or Stamp Duty Land Tax returns where required.

### **Reputational Risks**

We won't take any action in regard to tax that could damage our reputation. We'll comply with all our corporate and social responsibilities and communicate any issues that arise to our stakeholders where relevant.

## **Working with HMRC**

We're committed to having a transparent relationship with HMRC. We'll seek their advice and approval on any significant changes to our approach to tax or business decisions that affect tax. We'll correspond through the HMRC Public Bodies Group on matters of compliance or errors we identify.



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