

This document, approved by the board of Gi Group sets out the Group's approach to conducting its tax affairs and dealing with tax risks for the year ending 31 December 2017.

The UK Finance Director is a board member with executive responsibility for tax matters. All tax decisions are taken by individuals who are appropriately qualified. PWC is retained as the Company's tax advisors and are widely consulted and engaged on all tax related matters.

Gi Group is committed to:

- Following all applicable laws and regulations relating to its tax activities
- Applying diligence and care in our management of the processes and procedures by which all tax related activities are undertaken and ensuring that our tax governance is appropriate
- Retaining PWC as the company's tax advisors who are widely consulted and engaged on all tax related matters

RISK MANAGEMENT

Tax risks are identified allowing the Group to arrive at well-reasoned conclusions about how each individual risk should be managed. Where there is uncertainty in how the relevant tax law should be applied, external advice may be sought to support the Group's decision making process. The Group seeks to reduce the level of risk by operating internal controls which are regularly reviewed to ensure compliance with current laws and regulations.

TAX PLANNING

The Group manages risk to ensure compliance with legal requirements in a manner which ensures payment of the correct amount of tax. At all times, the Group seeks to comply fully with its regulatory and all other obligations and to act in a way which upholds its reputation as a responsible corporate citizen. In cases where the tax guidance is unclear or the Group does not feel it has the necessary expertise or knowledge to assess the tax consequences adequately, external advice may be sought to support the Group's decision making process.

APPROACH TOWARDS DEALING WITH HMRC

The Group is committed to the principles of openness and transparency in its approach to dealing with HMRC, and in particular the Group is committed to:

- Making fair, accurate and timely disclosure in correspondence and returns, and responding to queries and information requests in a timely fashion.
- Resolving issues with HMRC in a timely manner, and where disagreements arise, working with HMRC to resolve issues by agreement where possible.
- Being open and transparent about decision-making, governance and tax planning.
- Reasonably believe that transactions are structured to give a tax result which is not inconsistent with the economic consequences (unless specific legislation anticipates that result), nor contrary to the intentions of Parliament.
- Interpreting the relevant laws in a reasonable way, and ensuring transactions are structured consistently.
- Ensuring all interactions with HMRC are conducted in an open, collaborative and professional manner.

This document is in satisfaction of the Group's duties under Schedule 19 of the Finance Act 2016

Signed on behalf of the Gi Group

Jonathan Hardy
Group Finance Director – Gi Group UK