



Flagship Group
31 King Street,
Norwich,
Norfolk,
NR1 1PD
0808 168 4555
info@flagship-group.co.uk
flagship-group.co.uk

Flagship Housing Group Limited Tax Strategy

Introduction

This document presents the tax strategy of Flagship Housing Group Limited (the “Company”) and its subsidiary undertakings (together the “Group” or “Flagship Group”).

Flagship Housing Group Limited is a registered provider of social housing, an exempt charity registered under the Co-operative and Community Benefit Societies Act 2014.

Flagship Housing Developments Limited, Gasway Services Limited and Flagship Finance PLC are limited companies (limited by share capital) registered with Companies House in England and Wales.

Hopstead is a Charitable Incorporated Organisation regulated by the Charity Commission.

This tax strategy has been prepared in accordance with the provisions of Schedule 19 of the Finance Act 2016 as applicable to qualifying UK groups.

This strategy applies to all taxes applicable to the Group (including but not limited to corporate income taxes, land purchase taxes, value added tax and employment taxes). This document is owned and reviewed annually by the Board of Directors of Flagship Housing Group Limited (“the Board”).

The Board is responsible for setting and monitoring the strategic direction of the Group. The Group’s tax strategy, at its most succinct, is to support the Group to deliver its strategic objectives by organising its tax affairs in a legally compliant, transparent, responsible and efficient manner.

Flagship Group is committed to strong corporate governance as evidenced by its governance rating from the Regulator of Social Housing, its regulator.

The Group’s tax strategy is guided by its strategic values to:

- ✓ Deliver outstanding customer service
- ✓ Great people doing great things
- ✓ Spend money wisely
- ✓ Relentlessly improve performance

as it seeks to deliver its purpose of providing homes and creating sustainable communities. This document sets out the Group’s:

- ✓ Approach to governance and tax risk management arrangements
- ✓ Approach to and appetite for tax risk
- ✓ Approach to tax planning
- ✓ Approach to dealings with tax authorities

This document is reviewed annually, and its publication approved by the Board. This document will be reviewed in March 2024.

Scope

This strategy applies to all Flagship Group employees and to all third parties working on behalf of or providing advice to the Group. It endeavours to provide a professional responsibilities framework to guide the actions of individuals with tax accounting and reporting responsibility.

Responsibility and professional conduct

In relation to tax, the Group and any party working for or on behalf of it will aim to:

- ✓ Observe all applicable law, rules, regulations and disclosure requirements
- ✓ Apply diligent professional care and judgement to arrive at well-reasoned conclusions
- ✓ Ensure all decisions are taken at an appropriate leadership level and supported with documentation that evidences the facts, conclusions and risks involved
- ✓ Achieve certainty on tax positions adopted. Where tax law is unclear or subject to interpretation, written advice or confirmation will be sought as appropriate
- ✓ Develop and foster good working relationships with tax authorities, government bodies and other related third parties
- ✓ Undertake all dealings with tax authorities in a professional, courteous and timely manner
- ✓ Be compliant with all anti-bribery legislation
- ✓ Consider the Group's reputation, brand, corporate and social responsibilities when assessing tax related risk

Commercial rationale

The commercial needs of the Group **will not** in any circumstances override compliance with applicable laws and regulations.

Policy on disclosure

Compliance with all relevant statutory required disclosure will be adopted and all relevant information will be clearly presented to tax authorities or other relevant bodies, as appropriate and required. Openness, honesty and transparency are overarching principles and are expected in all dealings with tax authorities and other relevant bodies.

Appetite for risk

The Group's appetite for risk is governed and approved by Group Board and is based on risk tolerances across operating areas within the Group, which always consider the Regulator of Social Housing's Standards and relevant legislation. Tax risk should be proactively identified and mitigated to an acceptable level. All taxation judgements should be fully supportable, with a clear evidential trail, and based on appropriate professional advice.

Approach to risk

As with all businesses, the Group is exposed to tax risks and uncertainties. The following over-riding principle should be applied to managing taxation risk.

Over-riding principle: Tax risk is ideally managed by the prevention of unnecessary dispute. Prevention of unnecessary dispute is desired, appropriate and best achieved through:

- ✓ Strong and clear technical positions

- ✓ Taking appropriate professional advice
- ✓ Thorough documentation of relevant facts and assumptions
- ✓ Quantification of the amount of tax involved
- ✓ Well established relationships with tax authorities
- ✓ Strong compliance procedures ensuring accurate and complete tax returns

Assessment of risk should take due account of:

- ✓ Both short and long-term considerations and risks
- ✓ The impact on reputation and brand
- ✓ The consequence of disagreement with tax authorities over the application of law
- ✓ The benefit of certainty in respect of uncertain or disputed tax positions
- ✓ Professional advice taken

Attitude to tax planning

Flagship Group recognises the responsibility it has to a wide range of stakeholders, including its customers, employees, investors and HM Revenue and Customs ('HMRC'). This tax strategy seeks to balance the requirements of these stakeholders in a socially responsible manner whilst reflecting the regulatory, legal and commercial environment in which the Group operates.

The Group will not enter into artificial or abusive arrangements for the purpose of achieving a tax advantage. Where the Group has a choice on how to structure a particular business, transaction or investment, it will be structured in a tax-efficient manner in accordance with the principles presented within this strategy, where the Group has concluded that the approach is socially responsible and a sustainable choice, consistent with its core principles and values.

The Group accesses government sponsored tax incentives where appropriate and where these are in line with the Group's trading activities. For example, by utilising charitable donations relief, a scheme which enables trading subsidiaries to donate their taxable profits to the parent charity.

Tax authority relationships

The Group's strategic aim is to foster good working relationships with tax authorities and avoid unnecessary disputes. All dealings with tax authorities will be conducted in a professional, courteous and timely manner. The Group will seek to achieve its strategic aim through:

- ✓ Proactively managing the relationship with tax authorities through regular meetings to discuss current business initiatives and the associated tax accounting
- ✓ Where appropriate, seeking pre-transaction clearance from tax authorities
- ✓ Transparency in all interactions with tax authorities
- ✓ Ensuring that the appropriate individuals with responsibility for tax strategy actively participate in any tax authority formal consultation process where it is expected that the matter under consultation could have a material impact on the Group's tax liability, or where significant change in practice is being proposed that will impact the Group's tax compliance management
- ✓ Making the compliance procedures and controls available for review by HMRC upon request.

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

Companies within the Group for which this strategy applies to are:

Flagship Housing Group Limited (28460R)
Flagship Housing Developments Limited (5131085)
Gasway Services Limited (4158628)
Flagship Finance Plc (13448782)
Hopstead (CIO 1190324)

Dormant entities

Blue Flame (Colchester) Limited (5086439)
RFT Repairs Limited (8341166)
East Anglia Lettings Limited (8421578)
Flagship Community Housing Limited (9892942)
North Norfolk Housing Company Limited (5999428)