



Secure Trust Bank Group Tax Strategy

This tax strategy is published on the internet to meet our responsibility under Schedule 19 paragraph 16 Finance Act 2016 for the year ended 31 December 2020.

The approach of the Group to risk management and governance arrangements in relation to UK taxation

The Risk Committee exercises oversight of the risk exposures of the Group, considers and recommends for approval by the Board the risk appetite frameworks and overall risk appetite and tolerance.

Tax risks are incorporated in and managed using the Group's Operational Risk Management Framework. The controls to mitigate the tax risks are documented and tested.

The Board seeks to identify and comply fully with all applicable tax laws and regulations. As a banking group these obligations relate to both the tax affairs of the companies in the group and requirements to report information in respect of customers.

The Chief Financial Officer is the Senior Accounting Officer responsible for ensuring all group companies have appropriate tax accounting arrangements. Day to day management of the tax affairs is delegated to business Finance Directors, the Group Finance Controller and the HR department under the guidance of internal tax resource, supported by external professional advisers when required.

The production of some tax returns is outsourced to professional advisers but it remains the Group's responsibility to ensure they are accurate and contain appropriate disclosure.

Developments in activities undertaken by the Group and in tax law and practice are monitored for changes in tax risk the Group is exposed to. Examples of relevant developments are:

- tax changes in response to the Coronavirus pandemic
- the new disclosable arrangements legislation
- tax analysis of agreements and processes for new products and systems
- changes in banking profits triggering banking tax surcharge
- HMRC briefing note in respect of partial exemption on hire purchase overheads and
- the phased introduction of Making Tax Digital for VAT.

The attitude of the Group towards tax planning

The Group has signed up to the Code of Practice on Taxation for Banks. The Board has no appetite to undertake tax planning that is not consistent with the intentions of Parliament.

The Group does not promote tax planning opportunities to customers and uses customer due diligence processes with a view to minimising reputational risk exposure from inappropriate use of group products.

The level of risk in relation to UK taxation that the Group is prepared to accept

The Board seeks to ensure the Group understands and complies with its tax obligations and sufficient resources and controls are devoted to tax compliance to keep the risk of error within the low tolerance level set out in the Operation Risk Management Framework.

The approach of the Group towards its dealings with HMRC

The Group seeks to maintain a transparent relationship with HMRC.

The Group does not have an HMRC Customer Compliance Manager and so will approach different parts of HMRC in order to keep HMRC informed of relevant developments in its activities and the Group's assessment of the tax implications