



C. Hoare & Co. Tax Strategy

C. Hoare & Co.'s (the bank's) tax strategy is compliant with the UK tax strategy publication requirements as set out in Part 2 of Schedule 19 of the Finance Act 2016.

The tax strategy contains four principles:

1. **Take an open and transparent approach to managing the bank's tax obligations**

The Board believes in paying a fair amount of tax, at the correct time, in accordance with legislation. It has no tax risk appetite to mitigate its own, or customer's tax liabilities through planning that falls outside HMRC guidelines.

When considering potential tax initiatives, due consideration should be given to:

- the bank's values, reputation, brand, corporate and social responsibilities;
- the intentions of Parliament;
- the relevant legal and fiduciary duties of directors and employees of the bank and its subsidiary companies.

2. **Accept the tax implications of undertaking commercial business transactions**

Any operational or structural transactions that the bank undertakes, which may have a tax impact, must have a business purpose or commercial rationale. The Board has no appetite to engage in artificial tax arrangements.

Whilst the bank may consider different tax outcomes when considering how to structure a transaction, it will always ensure that the artificiality point is tested and that the chosen outcome is aligned with the existence of a commercial purpose.

3. **Be fully tax compliant**

The bank will comply with all relevant tax legislation. It will submit all returns and make payments by their due date, in accordance with the legislation. All material positions taken in tax returns should be supportable in terms of documentation, legal interpretation and be in compliance with the bank's overall Tax Strategy.

In situations where tax legislation is unclear, or subject to interpretation, the Senior Accounting Officer and the Head of Tax should be consulted. It is acknowledged that tax is a specialist area and if any position remains unclear an approach can be made to retained external tax advisers. Where either internal or external advice is required, written confirmation should be obtained.

4. **Pro-actively provide support to the business on tax issues**

The Board wishes to ensure that all bank businesses are aware of, and comply with, the Tax Strategy. The bank will invest, as appropriate, to provide appropriate tax support for both day-to-day operational work and in areas of business change.

C. Hoare & Co.

PRIVATE BANKERS SINCE 1672