

<b>Responsible Executive Director</b> Executive Director - Resources	Tax Strategy	
<b>Section</b> Finance	Updated: May 2024	

## 1 Aim

**The aim of the Tax Strategy is to ensure full compliance with all statutory obligations and full disclosure to relevant tax authorities. The Group's tax affairs are managed in a way which takes into account the Group's wider corporate reputation in line with Rooftop Housing Group's (Rooftop) overall high standards of governance.**

It supports our Corporate Plan and Annual Business Plan. Our role is to ensure we balance competing priorities, ensure ongoing financial viability, robust risk management and ensure good governance.

## 2 Vision

We provide good quality homes, reliable landlord services and support and advice..

## 3 Values

We Work Together

We Make Things Better

We Do The Right Thing

## 4 Equality, Diversity and Inclusion: Principles

At Rooftop we are committed to creating and sustaining a diverse and inclusive environment achieving positive outcomes for potential and existing customers, our colleagues and the wider community. Our commitments to our customers, colleagues and communities are detailed in our Equality, Diversity and Inclusion (EDI) Strategy. We are an organisation that values diversity, champions equality and inclusion. We demonstrate this through the activities and the services we provide. This means living by, working to and acting on our Values.

## 5 Customer and/or Community Engagement/Involvement

There has been no engagement with Customer and Community in producing this Strategy.

## 6 Scope

Rooftop is a responsible taxpayer in line with HM Revenue and Customs (HMRC) legislations and guidelines, for the avoidance of doubt, Tax Risk relates to any direct (tax on income) and indirect taxes (tax on expenditure), Value Added Tax ('VAT'), Corporation Tax ('CT'), Construction Industry Scheme ('CIS'), Stamp Duty Land Tax ('SDLT') and Employment taxes, including PAYE/NIC/Off payroll payment rules.

### **Governance in relation to UK taxation**

Ultimate responsibility for Rooftop's tax strategy and compliance rests with the Board of Rooftop Housing Group.

The Audit and Risk Committee monitors the integrity of Rooftop's financial reporting system, internal controls and risk management framework.

The Executive Director - Resources has executive responsibility for tax matters.

Day-to-day management of Rooftop's tax affairs is delegated to the Head of Finance who reports to the Executive Director - Resources.

The Rooftop Finance Team is staffed with appropriately qualified individuals and utilises professional advisers as required.

The Group Board ensures that Rooftop's tax strategy is one of the factors considered in all investments and significant business decisions taken.

Rooftop's tax risks are assessed through Rooftop's corporate risk management process during the year. This includes reporting to Executive Team, Audit and Risk Committee and the Boards on the most significant corporate risks.

## **Risk management**

Rooftop operates a system of tax risk assessment and controls as a component of the overall internal control framework applicable to the Group's activities.

Rooftop will manage the risks by applying tax law, legislation and decisions to routine everyday business operations. Rooftop will ensure that those charged with managing tax risks have the skills and ability to do so. Where appropriate, we use external tax specialists to ensure full compliance.

Processes relating to different taxes are dealt with by the relevant individual process owners (e.g. HR/payroll, Development), who carry out a review of activities and processes to identify key risks and mitigating controls are in place. These key risks are monitored for business and legislative changes which may impact them and changes to processes or controls are made when required.

Specific transactions undertaken by the Group, particularly land acquisitions, can be complex areas which give rise to greater risks. Rooftop will ensure that the risks are properly assessed, are appropriate and third party advice will be sought for transactions that are highly complex.

Advice is sought from external sources, including consideration of HMRC guidance and professional advice, where appropriate.

## **Attitude towards tax planning and level of risk**

Rooftop manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax.

When entering into commercial transactions, Rooftop seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation.

Rooftop does not undertake tax planning unrelated to such commercial transactions.

The level of risk which Rooftop accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the Group's tax affairs. At all times, Rooftop seeks to comply fully with its regulatory and other obligations and to act in a way which upholds its reputation as a responsible corporate citizen. In relation to any specific issue or transaction, the Board is ultimately responsible for identifying the risks, including tax risks, which need to be addressed and for determining what

actions should be taken to manage those risks, having regard to the materiality of the amounts and obligations in question.

### **Relationship with HMRC**

Rooftop will always adopt an open and collaborative approach to communicating with HMRC. We will engage with HRMC at the earliest opportunity to resolve disputes and to achieve early agreement and certainty. All matters with HMRC will be addressed through timely, compliant and transparent discussions, we will ensure that we do not expose the Group to any reputation damage or hinder our working relationship with the tax authorities. We will work collaboratively with HMRC should disagreements arise to resolve issues by agreement. We will proactively enter into dialogue with HMRC in relation to issues where the correct treatment is unclear.

When submitting tax computations and returns to HMRC, Rooftop discloses all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain.

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

## **7 Review**

This Strategy will be reviewed every three years unless there are major changes in legislation or good practice.