

Callcredit Tax Strategy

December
2017

Scope and Aim

Aim

Callcredit is committed to manage the tax position of the group in full compliance with all applicable laws and regulations and further, within the spirit of those laws, underpinned by an appropriate risk management and internal control framework, and an open and collaborative relationship with UK tax authorities



Scope

This strategy applies to the Callcredit group of companies as listed as the end of this documents, in accordance with paragraphs 19 and 25 of Schedule 19 to the Finance Act 2016. In this strategy, all references to 'Callcredit' are to all of these entities.

This strategy applies from the date of publication until it is superceded.

References to 'UK Taxation' are to the taxes and duties set out in paragraph 15(1) of the Schedule which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Land Tax. References to 'tax, 'taxes' or 'taxation are to UK taxation and to all corresponding worldwide taxes and similar duties.

Crown Acquisition Topco Limited is the ultimate parent company of the Callcredit group of companies

Governance

- The Board of Crown Acquisition Topco Limited, the UK parent undertaking of the group, has ultimate responsibility for Callcredit group's tax strategy and compliance
- The Board delegates executive management of the group to the Executive Committee
- The Audit and Risk Committee's requirement to monitor the integrity of Callcredit's financial reporting systems, internal controls and risk management framework includes taxation
- The Chief Financial Officer ('CFO') is the Executive Committee member with responsibility for tax matters and for ensuring that the tax strategy is considered in all significant business decisions
- Day to day management of tax affairs is delegated to appropriately qualified senior finance managers reporting to the CFO, each with clearly defined roles and responsibilities in relation to taxation



Risk Management & Tax Planning

- Callcredit operates a system of tax risk assessment and controls as part of the overall risk management and internal control framework within the firm's financial reporting and management systems
- Callcredit seeks to mitigate the level of tax risk arising from its operations as far as reasonably practicable by ensuring that reasonable care is applied in the design and operation of all processes related to tax compliance
- Callcredit monitors tax risks for business and legislative changes, in conjunction with retained leading professional advisors, from whom advice is sought where appropriate
- Callcredit's appetite for tax risk is low and risks are managed to ensure compliance both with legal requirements and the spirit of the law, to ensure payment of the correct level of tax and to uphold the reputation of the business
- The group takes a conservative approach to tax planning and will only utilise available tax incentives, reliefs and exemptions for the purposes for which they were intended

Dealings with HMRC

- Callcredit seeks to have a transparent and collaborative professional working relationship with HMRC
- Callcredit ensures that HMRC is kept aware of significant changes in the business and seeks to discuss any significant matters with HMRC prior to submission of any final documentation
- When submitting tax returns to HMRC, Callcredit discloses all relevant facts and identifies any non-standard transactions. Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified

Worldwide Tax

- Callcredit has a number of companies or permanent establishments around the globe
- The tax matters for the overseas entities are dealt with under the same strategy, risk management and internal framework as the UK, with local professional advisors engaged where appropriate to provide expert advice to ensure compliance

Entities covered by this Tax Strategy

Trading Companies

- Callcredit Limited
- Callcredit Consumer Limited
- Callcredit Information Group Limited
- Callcredit Marketing Limited
- Callcredit Data Solutions Limited
- Callcredit Lead Generation Limited
- Callcredit Public Sector Limited
- process benchmarking limited
- Decisonmetrics Limited
- Latitude Digital Marketing Limited
- Smart Analytics Limited
- Recipero Limited

Holding Companies

- Crown Acquisition Topco Limited
- Crown Acquisition Midco Limited
- Crown Acquisition Midco 2 Limited
- Crown Acquisition Bidco Limited
- Crown Acquisition Consumer Limited
- Coactiva Limited
- Smart Analytics Holdings Limited

Non-trading/Dormant Companies

- DMWSL 620 Limited
- DMWSL 619 Limited
- DMWSL 618 Limited
- DMWSL 617 Limited
- Call@credit plc
- Tenant ID Limited
- Smart Analytical Solutions Limited
- Immobilise.com Limited
- Appslock Limited
- CheckMend Limited