

Sureserve Tax Strategy





Sureserve Group

Tax strategy

This paper sets out the tax strategy of Sureserve Group Limited and its subsidiary undertakings (the “Group”) and has been prepared in accordance with the guidance and principles set out in Schedule 19, Finance Act 2016 for the year ended 30 September 2025. The Tax Strategy will be reviewed annually by the Board and is current as at July 2025.

This tax strategy (“the Strategy”) applies to all taxes applicable to the Group and the document is owned by the Board of Directors of Sureserve Group Limited (“the Board”). The Strategy is reviewed at least annually by the Board. Whilst the Board is responsible for setting and monitoring the Strategy, day to day management is delegated to the Group CFO with support from the wider finance team, company secretariat, human resources and, where appropriate, the commercial teams.

The Sureserve Group is a trusted partner of housing associations, local authorities and residents for compliance and energy services with a nationwide reach. We provide high-quality solutions that focus on energy efficiency to create warm, safe and compliant homes. Safety, excellence, integrity and respect are at the forefront of everything we do. This extends to our back-office functions and management of corporate affairs, of which taxation is a key element and His Majesty’s Revenue and Customs (“HMRC”) an important stakeholder.

The business activities and transactions of the Group incur taxes in the normal way in the UK. These taxes include corporate tax, stamp duty and similar transaction taxes, employment taxes, property taxes such as business rates, and indirect taxes such as VAT.

Our tax strategy objectives are first and foremost to comply with UK tax law. We take our responsibilities very seriously, both to the tax authorities and our wider stakeholder base. We manage the Group’s affairs with the most efficient means of delivery in mind and in this context, ensure management of taxes is aligned with the commercial and economic interests of the business, whilst taking a conservative approach to tax risk and being mindful of our reputation.

The Group’s approach to management of tax risk and governance

The Board is ultimately responsible for tax strategy, risk management and governance and reviews and approves the Group’s tax strategy annually. Day to day responsibility is delegated to the CFO, who oversees an experienced team. The Director of Group Finance oversees compliance and communicates regularly with local finance teams. Changes in tax legislation are shared and training arranged where changes are substantial or knowledge needs to be refreshed.

Quarterly meetings are held with the Group’s tax advisors BDO to go through all ‘live’ and upcoming tax matters across the Group.

The culture of the Group is one of openness and teamwork. Tax risks and issues are discussed with the CFO, the Chief Operating Officer, and/or the Chief Executive Officer as they arise and may be raised at meetings of the Board as appropriate.

Under the HMRC rating system, the Group is considered to be low risk. It is the Group’s intention to manage its affairs so as to maintain this low risk status as far as possible.



The Group's attitude to tax planning

The Group will not engage in artificial transactions the sole purpose of which is to reduce tax. However, the Group considers it responsible to consider the most tax efficient means of undertaking commercial transactions. Paramount though is that any tax treatment is compliant with UK tax law and in line with our ethical values as a Group.

The Group will not engage in tax efficient transactions if the underlying commercial objectives do not support the position, or if the arrangements impact detrimentally upon the Group's reputation, brand, corporate and social responsibilities, or future working relationships with HMRC. The Group seeks to minimise the risk of uncertainty or disputes in relation to its tax position and applies tax exemptions and incentives in the manner intended.

The Group employs BDO, a third party tax adviser, who guides the CFO, Director of Group Finance and local finance teams in all of their tax affairs. Finance teams are encouraged to seek advice of their local BDO office as a matter of course.

The Group and its tax risks

The Group's strategic aim is to improve its tax risk rating (as determined by HMRC's Business Risk Review process) each year.

We take a conservative approach to managing tax risk and seek to achieve compliance through:

- a thorough review of all tax returns to ensure they are correct and possess sufficient detail
- submission of tax returns on a timely basis
- paying our taxes on time
- ensuring local finance teams receive full support, both internally and courtesy of third party advisers

We however realise there are risks in taxation, particularly specific to certain of the industries in which we work. We seek to understand the complex tax nature of our environment and will consult with our external advisers and where appropriate, our HMRC Customer Compliance Manager ("CCM"), where there are areas of concern or clarification is required.

Working with HMRC

We aim to operate in an open and constructive manner with HMRC based upon the principle of transparency and to resolve any disagreements in a pragmatic and timely fashion.

The Group is in regular contact with HMRC staff, in most cases by email and phone calls, and periodic contact with our Customer Compliance Manager. We update HMRC about developments in our business and aim to supply the information they may require on a full and timely basis. While we are diligent and careful in tax filings, if we do become aware of an irregularity, the group will voluntarily disclose this to the tax authorities and correct the tax and payment position as needed

This Tax Strategy document has been prepared by the Board and communicated to senior management to ensure the Group is aligned in ensuring its tax affairs are managed in a consistent, honest, compliant and timely manner.

Approved by:

The Board

