

**Orion Group Policy**  
**September 2023**

# **TAX STRATEGY**



**Orion Group provides specialist recruitment services across a range of sectors including life sciences, renewables, oil and gas, construction & infrastructure, mining, nuclear, power & utilities, marine, IT and finance. Within our value outsourcing offering, Orion also provides clients with a range of managed service programmes (MSP's) tailored to meet the exact requirements of organisations and projects.**

Orion Group publishes this document in satisfaction of its duties under Schedule 19 of Finance Act 2016 and is effective for the year to 31 December 2022 and subsequent periods.

This document, approved by the group's directors sets out the group's policy and approach to conducting its tax affairs and dealing with tax risk, and is made publicly available to all Orion Group stakeholders.

This document will be periodically reviewed by the group tax team, and any amendments will be approved by Orion Group's directors.

**Orion Group is committed to being a responsible and compliant taxpayer in the countries in which it operates and does this through robust governance and clearly defined processes and controls. The group tax team partners with the wider business to ensure that:**

- the strategy is adopted and followed consistently across the group, with clear lines of responsibility and accountability;
- the strategy is aligned with the group's approach to risk management and corporate governance arrangements; and
- the group pays the right amount of tax required of it under the laws and regulations of the countries in which it operates.

**Orion Group is committed to conducting its tax affairs in a manner consistent with the following objectives;**

- to comply with all relevant laws, rules and regulations and reporting and disclosure requirements wherever the Group operates
- to ensure the tax strategy is at all times consistent with the Group's overall strategy, its approach to risk and the Group Core Values.
- to apply professional due diligence and care in the management of all risks associated with tax matters, and ensure governance and assurance procedures are appropriate and measured
- to foster constructive, professional and transparent relationships with tax authorities based on the concepts of integrity, collaboration and mutual trust
- to use incentives and reliefs to minimise the costs of conducting its business, but ensure that it does not to take an aggressive interpretation of tax legislation or use artificial tax avoidance schemes - any tax planning undertaken by Orion Group will have commercial and economic substance.

**Whilst by default this document applies to all UK companies within Orion Group under schedule 19 of the finance act 2016, the directors require that should apply across Orion Group as a whole.**

The group tax code of conduct outlines the principles governing the activities of Orion Group employees with respect to tax matters in support of the above group tax policy. The group operates a culture built on ethics and integrity. Non-adherence to the group's code of conduct could result in disciplinary actions, leading to sanctions up to and including dismissal. The group tax code of conduct is set out below.

## Compliance with Laws, Rules and Regulations

In line with Orion Group's Integrity core values, the group is committed to observing and adhering to all applicable laws and legislation regarding reporting and disclosure obligations.

A dedicated group tax department led by the group tax manager collaborates with the wider business and external advisors to provide advice and guidance to ensure compliance globally.

## Governance, Assurance and Tax Risk Management

The group finance director is responsible for the oversight of the group's tax risk, and reports to the board of directors on tax and finance affairs periodically throughout the year.

The group tax department manages the day-to-day responsibilities of Orion Group's tax affairs. They report to the group tax manager who, in turn, reports to the group finance director. Our internal tax team keeps up to date with legislative changes through training, continuing professional development and regular dialogue with external advisors.

Orion Group implements and maintains robust processes and controls which have been designed to minimise the risk of errors arising with regards to the group's tax affairs.

The processes and controls are subject to a rolling review and are regularly monitored and tested by our group tax team, with results reported to the group finance director periodically.

Formal policies apply to ensure that decisions relating to tax are made at the appropriate level based on value, complexity, and potential impact on the business. Where there is uncertainty as to the application or interpretation of tax law, appropriate written advice is sought from third party advisors, evidencing the facts, risks and conclusions, to support the decision-making process.

## **Approach to Dealing with Tax Authorities**

The group adopts a proactive and transparent approach in complying with its tax filing, reporting and tax payment obligations globally. The group strives to maintain good relationships with tax authorities and other relevant bodies to ensure early agreement of disputed matters, and to achieve certainty where possible over the appropriate treatment of tax transactions. Where countries have poorly regulated tax policies and procedures, Orion Group engages with them through in-country tax advisors to ensure fair and appropriate amounts of tax are paid.

In the UK, the group finance director proactively engages with the customer compliance manager at HMRC in order to discuss any significant issues that may impact the tax payable by the business, thereby minimising the risk of any uncertainty, dispute, or damage to the group's reputation.

## **Orion Group Attitude Towards Tax Evasion**

Orion Group does not condone tax evasion or the facilitation of tax evasion, regardless of whether it is undertaken by an employee or any other associated partner acting alongside the group.