

Purpose and Introduction

This Tax Strategy sets out Hartwell plc's ('Hartwell') approach to tax and satisfies the requirement to publish its tax strategy under Schedule 19 of the Finance Act 2016.

This Tax Strategy applies to the year ended 30 November 2019 and specifically applies to all Hartwell plc entities under the Oakhill Group.

As a business, Hartwell plc comprises multiple dealerships and various subsidiaries including Hartwell Finance Limited and Hartwell Automotive Group Limited. During the year ended 30 November 2019 the dealerships represented the following marques: Ford, Citroen, Peugeot, Seat, Renault, Dacia, Fiat and MG. All our sites are located geographically in the UK.

The Group's principal activities include vehicle distribution, sales, service and associated activities, property developments and investments. In this regard, Hartwell Finance provides finance for hire purchase and leasing of vehicles and provision of insurance products to the motor trade and we are regulated by the FCA.

At Hartwell, we take our commitment to ethical behaviour very seriously, and this is set out within our Code of Ethics (click [here](#)). This Code of Ethics sets out our values that support "our employees, in accordance to his or her judgement and sense of responsibility, to seek and take the correct decision in any given situation, in accordance with the laws and regulations applicable in the countries in which the Group operates and the social, societal and environmental commitments under taken."

Our Tax Strategy was reviewed at the date of approval of 22 November 2019 and will continue to be reviewed annually. Hartwell has historically operated under the principles as set out below, and we are committed to the ongoing delivery of this Tax Strategy throughout the business.

The principles of our Tax Strategy align to our Code of Ethics and in this regard, our key principles are focused on:

1. Our commitment to act in accordance with all applicable tax laws and regulations
2. Ensuring all our tax planning is aligned to commercial and economic activity
3. Maintaining a strong tax governance framework focused on the early identification and management of tax risk
4. Having a low appetite for tax risk and working with tax authorities in an open and collaborative manner to achieve certainty wherever possible

Risk Management and Governance principles

Overall accountability of Hartwell's tax affairs sits with the Board and this is based on effective governance and oversight, clear escalation mechanisms and a focus on risk management and transparency. This includes procedures in how tax risk is managed and escalated to the Board on a quarterly basis.

Day to day management of Hartwell's tax affairs is within the remit of the Finance Director who reports directly to the Board. In this regard, the Finance Director is responsible for ensuring that tax risk issues are identified across the business and how these are responded to. In the UK, this includes the identification, assessment and management of tax risks in compliance with the Senior Accounting Officer requirements.

In meeting our tax compliance and reporting obligations, Hartwell aims to apply diligent professional care and judgement in meeting these requirements. Specifically, Hartwell has an internal control framework relating to its tax compliance processes. This includes the management of tax risk through systems and controls such as segregation of duties, initial and second levels of review and reconciliations back to underlying systems. These are reviewed additionally as part of our SAO procedures.

Hartwell does not tolerate tax evasion or the facilitation of tax evasion. Following the introduction of the new Corporate Criminal Offence of Failure to Prevent the Facilitation of Tax Evasion legislation, which came into force on 30 September 2017 as part of the Criminal Offences Act 2017, Hartwell seeks to apply appropriate procedures and controls to prevent any person acting on its behalf from facilitating tax evasion.

Tax Planning principles

Hartwell has a low risk appetite. In relation to tax planning, this means we seek to only engage in tax planning that reflects our business and our commercial strategy, and which does not lead to an abusive result.

We appreciate that tax law and regulation can be open to interpretation and where any uncertainty exists, we seek advice from external advisors as appropriate. We will also seek advice when responding to tax incentives and exemptions to ensure we apply these legitimately and that they align to the intentions of government as well as our own commercial activities.

Our principles in regards to our relationships with tax authorities

We seek to build and maintain strong collaborative and open relationships with tax authorities. This means we aim to update HMRC on a regular basis about developments in our business, including when there are any significant business events. We also see benefit in reaching out to HMRC in relation to areas of particular tax complexity or where there may be interpretations of tax law.

Specifically, in meeting these objectives in how we work with HMRC, we seek to maintain regular contact with our CCM.

Approved by the Board on 22 November 2019