



Elysium Healthcare Tax Strategy for the UK

Background

Elysium Healthcare ('Elysium') was launched in December 2016 and, following a number of acquisitions, we operate over 50 hospitals and other facilities across England & Wales, giving a portfolio across mental health care, neurological care, education, children's services and private patient services.

Our aim is to set new standards in the delivery of specialist care through our strategic network of sites, providing a complete pathway of care.

We are committed to acting ethically in all our business dealings. This is reflected in our four values that set the standard for how we manage our decisions and our actions as a company. See [Our Values](#). These values underpin the standards of conduct in how we expect our employees to behave and this includes Integrity, namely our commitment to being open, honest and transparent.

This Tax Strategy document seeks to align to these standards of conduct in how we carry out tax activities across the organisation.

Our Tax Strategy

This Tax Strategy is applicable to Elysium tax activities as they relate to UK taxation.

This document meets the requirement for Elysium to publish its Tax Strategy as required by section 161 and paragraph 16(2) of Schedule 19 of Finance Act 2016. It is effective for the accounting period ended 31 December 2020 and is relevant for Elysium Healthcare Group Limited, a Guernsey based company that has elected into the UK taxation regime, and its subsidiary companies.

Tax Compliance and Reporting

We are committed to meeting all our legal and regulatory requirements in paying the correct amount of tax and meeting our tax compliance obligations. Compliance with all laws and regulations, including those relating to tax is embedded in the culture of the business and we have an established internal control system and procedures to help achieve this.

As part of this, we seek to apply diligent professional care and judgement in all our tax compliance activities, and providing sufficient evidence to support all judgements made.

Our approach to risk management and governance arrangements

The Directors of the Group Board have overall accountability in ensuring that tax is considered within the wider context of the business and in how tax risk is managed across Elysium.

Compliance and risk matters, including those concerning taxation, are included on the agenda at board meetings.

The Chief Financial Officer has responsibility over Elysium's approach to UK tax on a day-to-day basis and is supported by the Group Financial Controller and an experienced in-house finance team. Together, they are responsible for the identification, prioritisation and monitoring of tax risk across the UK business, as well as the escalation of tax risk to the board of directors. This is supported by the business' commitment to fostering an open culture and ensuring there is a clear segregation of duties.

Elysium seeks to maintain a low threshold for risk in respect of UK taxation and we are committed to operating in a fair and ethical manner. We are not prepared to accept a level of risk that could expose us to reputational harm and / or which could adversely affect our relationship with HMRC.

Where there is significant uncertainty or complexity in relation to tax risk, we will seek input from external advisors.

Our approach towards tax planning in relation to UK taxation

We have a low risk appetite to tax planning as it affects UK taxation, and tax decisions are aligned to business and commercial strategy. Like any other business expense however, we seek to create value for our shareholders. As such, we may respond to tax incentives and reliefs where appropriate and in a way that is consistent with HMRC and government policy.

As appropriate, we will seek external professional tax advice to ensure we apply these incentives and reliefs legitimately, particularly if the outcome of a transaction is uncertain or complex. If appropriate, we will seek advance clearances with HMRC to ensure we minimise the risk of uncertainty.

This approach ensures that we can maximise shareholder value whilst complying with applicable legislation requirements and HMRC guidance.

Transparent and professional relationship with HMRC

Elysium is committed to working with HMRC in an open, honest and transparent manner. Wherever possible, we will seek to work collaboratively with HMRC in terms of keeping them up to date about any commercial developments and events in our business that may have a tax impact and will work with HMRC to achieve early agreement on matters of complexity. The Chief Financial Officer has developed this Tax Strategy.

Approved by the Board 25th November 2020.