

SCOPE

This strategy applies to Rociale Healthcare Limited in accordance with paragraph 19 of Schedule 19 to the Finance Act 2016 ('the Schedule').

References to 'UK Taxation' are to the taxes set forth in paragraph 15 (1) of the Schedule which includes Corporation Tax, PAYE, NIC and VAT while references to 'tax', 'taxes' or 'taxation' are references to UK Taxation.

By publishing this strategy on the Rociale Healthcare Limited website, Rociale Healthcare Limited complies with the requirements of the Schedule in respect of the year ended 31 December 2021.

COMMITMENT TO COMPLIANCE

Rociale Healthcare Limited operates a responsible approach to the management of taxes and is committed to full compliance with all statutory obligations and full disclosures to HMRC. Compliance for Rociale Healthcare Limited means, paying the right amount of tax in the right place at the right time. It further involves disclosing all relevant facts and circumstances to HMRC and claiming reliefs and incentives only when available.

Rociale Healthcare Limited's tax affairs are managed on a day-to-day basis in a manner which takes into account the company and its shareholders' wider corporate responsibility and reputation and is aligned to Rociale Healthcare Limited's commitment to the highest standards of corporate governance.

ROCIALLE HEALTHCARE LIMITED'S APPROACH TO RISK MANAGEMENT AND GOVERNANCE ARRANGEMENTS IN RELATION TO TAXATION

Ultimate responsibility for Rociale Healthcare Limited's tax risk management and compliance rests with the Chief Financial Officer with oversight of the Rociale Healthcare Limited's Board of Directors.

Processes relating to different taxes are allocated to appropriate process owners, who carry out a review of activities and processes to identify key risks and ensure mitigating controls are in place. These key risks are monitored for business and legislative changes and amendments to processes or controls are made when required.

Appropriate training as well as support from the Rociale Healthcare Limited Finance Department is available to staff who manage and/or process matters which have tax implications.

The management of tax risk and tax compliance is supported by internal control frameworks which govern the commercial operations of Rociale Healthcare Limited and are subject to regular reviews by the Chief Financial Officer and external advisers.

RESPONSIBLE ATTITUDE TO TAX

Rociale Healthcare Limited carefully manages the tax risks and costs inherent in its commercial transactions, in the same way as any other cost. When entering into commercial transactions, Rociale Healthcare Limited seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, the relevant tax legislation. Rociale Healthcare Limited does not engage in artificial or contrived schemes or arrangements.

Reliance is placed upon external tax advisors where there is need for specialist guidance and support.

HOW MUCH TAX RISK IS ROCIALLE HEALTHCARE LIMITED PREPARED TO ACCEPT?

The level of risk that Rociale Healthcare Limited accepts in relation to taxation is consistent with the overall objective of achieving as much certainty as possible with respect to its tax affairs. At all times the company seeks to comply fully with its regulatory and other obligations and to act in a manner consistent with the company's commitment to best practice in corporate governance and responsible corporate citizenship.

In relation to any specific issue or transaction, the Chief Financial Officer, with oversight from the Board of Directors, is ultimately responsible for identifying the risks, including tax risks, which need to be addressed and for determining what actions should be taken to manage those risks, having regard to the materiality of the amounts and obligations in question. The company does not operate pre-defined limits as to the amount for acceptable tax risk; it is judged on a case-by-case basis.

Part of the assessment of risk of any transaction includes the likely HMRC view of the tax outcome and the potential impact on the company's ongoing relationship with HMRC.

RELATIONSHIP WITH HMRC

Rociale Healthcare Limited has an open, transparent and constructive relationship with HMRC through communications in respect of developments in the company's business, current, future and retrospective tax risks, and interpretation of the law in relation to all relevant taxes.

Rociale Healthcare Limited ensures that HMRC is kept aware of significant transactions and changes in the company's business and seeks to discuss any related tax issues as soon as possible. When submitting tax computations and returns to HMRC, the company discloses all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain.