

## **KEYS GROUP TAX STRATEGY DOCUMENT**

### **Background**

The Keys group of companies (“Keys Group”) constituting Keys Group Limited and its subsidiaries provides specialist care, support, education and activities for young people and adults. Keys Group supports people who have physical and emotional difficulties, physical disabilities, learning disabilities and special educational needs. The Group operates throughout England and Wales.

### **Scope**

This strategy applies to Keys Group Limited and to the group of companies headed by Keys Group Limited in accordance with paragraph 16 of Schedule 19 to the Finance Act 2016. In this strategy, references to ‘Keys Group Ltd’ or ‘the Group’ are to all these entities. The Tax Strategy is reviewed annually and approved by the Keys Group Board and was published on 20<sup>th</sup> March 2024. The Group regards this publication as complying with its duty under paragraph 16(2) Schedule 19 FA 2016 for its financial year ended 31 March 2024.

This strategy applies from the date of publication until it is superseded. References to ‘UK Taxation’ are to the taxes and duties set out in paragraph 15(1) of the Schedule which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Land Tax. References to ‘tax’, ‘taxes’ or ‘taxation’ are to UK taxation and to all corresponding worldwide taxes and similar duties in respect of which the Group has legal responsibilities.

### **Our Tax Strategy**

The Board of Keys Group is responsible for ensuring the tax obligations of the Group are understood, complied with and appropriately managed. We seek to manage the Group’s tax affairs in a way which takes into account the Group’s wider corporate reputation in line with our overall high standards of governance.

### **Governance in relation to UK taxation**

Ultimate responsibility for managing Keys Group’s tax risks and tax compliance lies with the Board, with this responsibility delegated to the CFO.

Our Group Tax Manager provides advice to the business on tax related issues, oversees UK tax compliance-related matters and manages Keys Group’s relationship with HMRC and third-party tax advisors.

The Finance teams are staffed with appropriately qualified individuals

### **Tax Risk Management**

Tax risks are identified and managed as part of Keys Group’s wider control processes for financial risks and compliance to ensure that any risk areas are identified and mitigated to the low level of risk that is acceptable to the Group.

The Group seeks to reduce the level of tax risk arising from its operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to processes which could materially affect its compliance with its tax obligations.

Advice is sought from external advisers where appropriate.

### **Attitude to Tax Planning**

Keys Group takes a responsible, transparent approach to tax planning and the management of its tax affairs. We are committed to comply with all relevant laws, rules, regulations, statutory reporting and disclosure requirements.

When entering into commercial transactions, we aim to structure our operations and our finances in a tax efficient manner and would seek to take advantage of available tax incentives and reliefs available to us. We do not undertake tax planning in isolation without a clear commercial or operational purpose.

Keys Group sees the payment of the correct amount of taxation as the responsibility of the business.

Where there are any decisions to be made in respect of uncertain or complicated tax issues, these will be made with due regard to technical analysis and where appropriate we would seek appropriate third-party advice.

#### **Attitude to Tax Risk**

Our Tax Strategy is that we do not have an appetite for significant tax risk. Our reputation, brands and stakeholders are important to us and as a result we have a low tolerance for a level of tax risk that could damage these.

Therefore, the level of risk which Keys Group Limited accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the Group's tax affairs. At all times Keys Group Limited seeks to comply fully with its regulatory and other obligations and to act in a way which upholds its reputation as a responsible corporate citizen. In relation to any specific issue or transaction, the Board 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.

#### **Relationship with HMRC**

The Group maintains an open and honest relationship in its dealing with HMRC and seeks to work collaboratively with HMRC in relation to its tax dealings.

When submitting tax computations and returns to HMRC, the Group aims to disclose all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain. The Group aims to ensure that tax returns are submitted on time and any associated tax liabilities are settled promptly.

We would want to ensure that any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.