

Devon Equity Management Limited
FRN: 841960
Tax Strategy Statement
20 November 2019

At Devon Equity Management Limited (“Devon”) it is important to us that the right amount of tax is paid at the right time and in the right place. We understand that we have a firm responsibility and that the taxes that we pay are part of our contribution to society. We also appreciate that tax transparency is part of the way in which we build trust with stakeholders.

This strategy applies to Devon in accordance with Schedule 19 to the Finance Act 2016. This strategy has been published in accordance with the provisions of paragraph 16 of the Schedule by being included on the internet site at www.devonem.com.

The strategy was approved and published on 15th November 2019 by the Devon Board of Directors and remains in force until 31st December 2020. The Strategy is revisited, updated where necessary, and re-approved by the Board annually.

Managing UK tax risks

In summary, it is our aim to:

- Meet all legal requirements and make all appropriate returns and payments, in a timely and accurate manner;
- Always consider the firm’s reputation, brand, and social responsibilities;
- Consider tax as part of every major business decision and operate the appropriate tax, risk and governance processes, including Board oversight;
- Not undertake transactions whose sole purpose is to create an abusive tax result, or which are outside of the firm's risk appetite;
- Keep up-to-date with changing tax legislation and requirements by means of regular consultation with our professional advisors;
- Maintain an open and helpful relationship with HMRC at all times.

Tax planning process

Devon’s attitude to tax planning is summarised below:

- The Board is responsible for ensuring that detailed consideration is given to the tax implications of any major new initiative. The Board ensures that the sustainability of any project is considered - including taxation considerations - before approval is granted.
- The Chief Executive Officer and our professional advisors keep Devon up to date with the changing tax legislation and requirements. This ensures that we are well positioned to enact any changes that result.
- We will not undertake transactions whose purpose is to create an abusive tax result or which are outside of the Group's risk appetite. The planning process will examine the tax effects of a number of approaches to ensure a sustainable and appropriate taxation result. We will consult professional advisors for confirmation of approach, or to clarify any areas of doubt, if required. If necessary, we will ask for guidance and/or pre-approval (where possible) from HMRC.

Appetite for tax risk

Devon’s appetite for tax risk is summarised below:

- Risks may arise from time to time in relation to complex tax law. Devon actively seeks to identify, evaluate, monitor and manage these risks to ensure that they remain low and in line with our objectives. Where there is uncertainty or complexity in relation to a risk, external advice will be sought.

- It is our aim to run the firm with as low a tax risk as possible. We appreciate the damage that could be inflicted on our reputation as a safe and suitable place for our clients' investments were the level of tax risk to lead to a significant liability.
- Our reputation is of the utmost importance to our business credibility and we seek to protect it wherever possible. Our clients expect us to maintain a low tax risk.

Working with the HMRC

Devon's attitude to working with the HMRC is summarised below:

- We engage with HMRC with honesty and integrity. Our aim is to meet all legal requirements and make all appropriate returns and payments, in a timely and accurate manner.
- Where there is doubt or a need for clarification, we will engage with HMRC in an open and transparent way and where possible seek pre-approval. Where such pre-approval is not available, we will seek written opinion from our professional advisors.

Richard Pavry
Chief Executive Officer