

SCHEDULES

SCHEDULE 19

LARGE BUSINESSES: TAX STRATEGIES AND SANCTIONS

PART 2

PUBLICATION OF TAX STRATEGIES

Content of a company tax strategy

- 23 (1) The company tax strategy must set out—
- (a) the company's approach to risk management and governance arrangements in relation to UK taxation,
 - (b) the company's attitude towards tax planning (so far as affecting UK taxation),
 - (c) the level of risk in relation to UK taxation that the company is prepared to accept,
 - (d) the company's approach towards its dealings with HMRC.
- (2) The company tax strategy may include other information relating to taxation (whether UK taxation or otherwise).
- (3) The information required by sub-paragraph (1) to be included in a company tax strategy does not include any information about activities of the company that consist of the provision of tax advice or related professional services to other persons.
- (4) The publication of information as a company tax strategy does not constitute publication of the strategy for the purposes of paragraph 22 unless the company makes clear (in a way that will be readily apparent to anyone accessing the information online) that the company regards its publication as complying with the duty under paragraph 22(2) in the current financial year.