



## Tax Policy

**Publication Date: 18th December 2020**

### 1.ABOUT US

We are one of the UK's major providers of dentistry with over 70+ local clinics. Part of the Colosseum Dental Group (Europe's most rapidly growing dental company), we have a mission to provide modern, quality dentistry services for the benefit of patients, dentists, employees and shareholders, striving for continuous growth and excellence.

This is the tax strategy of Triventura Midco I Limited and its UK subsidiaries (collectively "The Colosseum Dental UK Group", "The Group", or "Us").

### 2.OVERVIEW

This document sets out the Group's approach to the management of UK taxation matters impacting on the Group and defines the principles governing the management of such taxes.

We are guided by three fundamental principles which reflect our commitment to quality dental care:

- Care: We are passionate about dentistry and care for our patients, colleagues, and team members and communities, we operate in.
- Entrepreneurship: We are empowered to think and act like owners and to be accountable for our actions.
- Collaboration: We work as a team to achieve the best results for our patients.

These principles apply to everything we do, and we expect our employees and team members to respect these values and beliefs and live by them at all times. They further extend to our corporate governance and tax strategy.

We must identify, evaluate, and properly manage all key tax risks. We aim to ensure all compliance is properly controlled and managed to meet our legal obligation to fulfil our duties under the taxation laws. We maintain strong, open, and professional working relationships with the tax authorities and consults external advisors as appropriate.

We support the OECD international tax reform work on Base Erosion and Profit Shifting (BEPS) and adopt a compliant approach to tax management, consistent with our commitments and growth strategy.

### **3.GOVERNANCE AND MANAGEMENT OF TAX RISKS**

The Colosseum Dental UK Group Board (“The Board”) has overall responsibility for the management of tax aspects of the functions for which it is responsible. The Financial Controller manages all direct and indirect tax matters and reports to the Chief Financial Officer. The Chief Financial Officer is on the Board, and has overall responsibility for tax, including oversight with other members of the Board where their teams have operational responsibility for some transactions which may impact our tax position.

Tax risk management is a key point of interest and concern of the Board. We consider it essential to ensure we maintain our good corporate reputation and financial credibility to minimise our exposure to any tax risks.

The Finance team manage a comprehensive set of procedural documents and controls to properly identify, manage and mitigate tax risks.

### **4.TAX PLANNING**

We seek to manage our tax position in a well-balanced manner to achieve tax efficiency. In making any decisions, we are ultimately guided by our principles as set out in section 2, in the management of all businesses, transactions, and investments. Colosseum Dental does not adopt aggressive interpretation of tax laws and does not engage in any tax-avoidance structures.

The Group strictly complies with all applicable tax laws and regulations and utilises available reliefs for the purposes for which they are intended.

Clear ownership and effective operation of end-to-end processes and the clear segregation of roles and responsibilities to identify and control tax risks are fundamental to the successful management of the Group’s tax affairs, which are clearly communicated.

The Group employs suitably qualified staff and engages external tax advisers to ensure the Group is not exposing itself to tax risk where issues are complex, potentially material or where the matter is subjective, and an expert opinion is required.

The individuals responsible for tax work very closely with the business and are involved in and consulted on projects.

### **5.ATTITUDE TOWARDS UK TAXATION RISKS**

The Group has a consistent tax strategy which is applied to all business activities in the UK. We strive to proactively and reasonably reduce the level of tax risks arising from our UK business operations.

Effective coordination and communication play a crucial part towards the achievement of this objective and stakeholders are consulted on and must advise on any significant transaction or variation to existing arrangements prior to the Group making any commitment.

The Group has implemented strong internal policies and processes, to ensure that tax risks are managed systematically and maintained at an acceptable level.

## **6.APPROACH TO WORKING WITH HMRC**

The Group is committed to maintaining an open and collaborative relationship with HMRC. Whilst we do not have an appointed Customer Compliance Manager, the Group's relationship with HMRC will always be based on a cooperative and supportive interaction with the overarching principle of transparency.

We engage with HMRC to discuss and agree specific issues or positions, and where issues arise, these are disclosed promptly to HMRC in order to ensure a swift resolution.

### **Note**

Triventura Midco I Limited, and its subsidiaries regard this publication as complying with their duty under para 16(2) and, Schedule 19 of the Finance Act 2016 for our financial year ended 31st December 2020. This document has been approved by the Board.