

Riverstone - Tax Strategy

Scope

This strategy applies to the “**Riverstone Group**”, the group of companies headed by Riverstone Living Holdings Limited in accordance with paragraph 10 of Schedule 19 to the Finance Act 2016. A list of the entities to which it applies is set out below. In this strategy, references to ‘Riverstone Living Holdings Limited’, or ‘the group’ are to all these entities. This tax strategy was published on 17th November 2020 and the group regards this publication as complying with its duty under paragraph 16(2) Schedule 19 Finance Act 2016 in its financial year ended 31 December 2020.

This strategy applies from the date of publication until it is superseded.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. 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.

Aim

The Riverstone Group is committed to full compliance with all statutory obligations and full disclosure to relevant tax authorities. The group’s tax affairs are managed in a way which takes into account the group’s wider corporate reputation and is in line with the group’s overall high standards of governance.

Governance in relation to UK taxation

- Ultimate responsibility for the group’s tax strategy and compliance rests with the Board of the Riverstone Group;
- Executive management of the group is delegated by the Board to the Chief Executive Officer (‘CEO’);
- The Chief Financial Officer (‘CFO’) has senior responsibility for tax matters.
- The Audit & Risk Committee’s requirement to monitor the integrity of the group’s financial reporting system, internal controls and risk management framework, expressly includes those elements relating to taxation;
- The CFO reports to the Audit and Risk Committee and the Board on the group’s tax affairs and risks during the year.
- The group’s finance team, which is responsible for tax matters, is resourced with appropriately qualified individuals;
- The CFO and the Board ensures that the group’s tax strategy is one of the factors considered in all investments and significant business decisions taken;

Risk Management

- The Riverstone Group operates a system of tax risk assessment and controls as a component of the overall internal control framework applicable to the group’s financial reporting system;
- The Riverstone 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 all processes which could materially affect its compliance with its tax obligations;
- Appropriate communication is provided and / or training is carried out for colleagues outside the Riverstone finance team who manage, or process matters which have tax implications;
- Advice is sought from reputable and professional external advisers where appropriate;

Attitude towards tax planning and level of risk

The Riverstone Group manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax.

When entering into commercial transactions, the group seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation. The group does not undertake tax planning unrelated to such commercial transactions.

The level of risk which the group accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the group's tax affairs. At all times the group 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 Riverstone Group seeks to ensure that all interaction with HMRC is conducted in an open, transparent and professional manner to facilitate a constructive relationship.

When submitting tax computations and returns to HMRC, the Riverstone Group discloses all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain.

Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.

List of entities covered by this Tax Strategy

- Fulham Riverside Property Limited;
- Kensington Row Property Limited;
- Riverstone Development Limited;
- Riverstone Living Holdings Limited;
- Riverstone Operations Limited.