



THE AF GROUP LIMITED TAX STRATEGY

This document, approved by the board of The AF Group Limited, sets out the group's approach to conducting its tax affairs and dealing with tax risks for the year ended 31 January 2021. It has been published in compliance with paragraph 16(2) of Schedule 19 to Finance Act 2016.

We are committed to:

- Following all applicable laws and regulations relating to our tax activities.
- Maintaining an open and honest relationship with the tax authorities based on collaboration and integrity.
- Ensuring that the tax strategy adopted is consistent with our overall strategy.
- Applying diligence and care in our management of tax risks, and ensuring that our tax governance is appropriate.

Risk management and governance arrangements

The AF Group Limited is registered by the Mutual Societies Registration of the Financial Conduct Authority. As a result of the mutual status of The AF Group Limited no Corporation Tax is chargeable on the surplus arising from activities with our members. We do however pay Corporation Tax on trading with non-members.

The inherent tax risk within the group is considered to be very low, given the mutual status and the fact the vast majority of our transactions are with members. However, any such tax risk is primarily managed by our internal processes and procedures. The AF Group seeks to reduce the level of tax risk arising from its operations as far as is reasonably practical by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations. Where appropriate, advice is sought from third party tax advisors.

Our business model and operating structure is straightforward. We do not seek to artificially manipulate our business affairs in order to unreasonably minimise our tax liabilities. We aim to pay the right amount of tax in accordance with the spirit, as well as the letter, of the law at all times.

Tax planning

We will only utilise legitimate tax reliefs for the purposes for which they were intended by Parliament.

We do not:

- Engage in aggressive tax planning,
- Seek to structure transactions in an artificial manner whereby results are inconsistent with the underlying economic consequences; or
- Promote tax avoidance or condone abusive tax practices.

Due to the nature of our society, we do not engage in tax planning arrangements. Where appropriate however we will seek external tax advice in certain situations, for example as a second opinion in cases where we believe there is uncertainty with respect to the application of tax law, although we may also approach HM Revenue & Customs directly, to seek clarity or obtain clearance.

Tax Compliance and relationship with tax authorities

Our objective is to build a professional working relationship with HM Revenue & Customs. We aim to engage in full, open and early dialogue with the Revenue at all times.

Signed on behalf of the AF board:

A handwritten signature in black ink, appearing to read 'M. Lomas'.

Chief Executive
30 April 2021