This document, approved by the board of Hachette UK, sets out the Group's approach to conducting its tax affairs and dealing with tax risks for the year ending 31 December 2018.

The Hachette UK Group is committed to:

- Following all applicable laws and regulations relating to its tax activities and submitting all returns by their due dates.
- Maintaining an open and honest relationship with the tax authorities based on collaboration and integrity.
- Applying diligence and care in our management of the processes and procedures by which all tax related activities are undertaken, and ensuring that our tax governance is appropriate.
- Using incentives and reliefs to minimise the tax cost of conducting our business while
  ensuring that these reliefs are not used for purposes which are knowingly contradictory
  to the intent of the legislation.

## **Risk management**

Managing the Group's tax affairs is a complex process across many functional areas of the business and as such there will inevitably be risks of error or omission within those processes (tax risks), which may result in the incorrect application of tax rules or calculation of tax returns. Eliminating tax risks entirely is impossible. Therefore, the Group's attitude towards the level of control required over the processes designed to reduce these tax risks is driven by the likelihood of occurrence and scale of the impact of each risk.

The identified tax risks are then assessed on a case by case basis, allowing the Group to arrive at well-reasoned conclusions on how each individual risk should be managed. Where there is uncertainty in how the relevant tax law should be applied, external advice may be sought where applicable to support the Group's decision making process.

When reviewing the tax risks associated with a specific decision or action, the Group ensures that the following are considered:

- The legal and fiduciary duties of directors and employees.
- The requirements of any related internal policies or procedures.
- The maintenance of the Group's corporate reputation, with particular regard to the way we interact with the communities around us.

## Tax planning

The Group has clearly defined lines of responsibility for its tax affairs, ensuring that they are dealt with at an appropriate level.

The Group's tax planning aims to support the commercial needs of the business by ensuring that the companies' affairs are carried out in the most tax efficient manner whilst remaining compliant with all relevant laws. The tax function therefore aims to be involved in commercial decision-making processes and provides appropriate input into business proposals to ensure a clear understanding of the tax consequences of any decisions made.

In cases where the tax guidance is unclear or the Group does not feel it has the necessary expert knowledge to assess the tax consequences adequately, external advice may be sought to support the Group's decision making process.

#### Approach towards dealings with HMRC

The Group is committed to the principles of openness and transparency in its approach to dealing with HMRC. In particular, the Group is committed to:

- Making fair, accurate and timely disclosure in correspondence and returns, and responding to queries and information requests in a timely fashion.
- Seeking to resolve issues with HMRC in a timely manner, and where disagreements arise, working with HMRC to resolve issues by agreement where possible.
- Being open and transparent about decision-making, governance and tax planning.
- Reasonably believing that transactions are structured to give a tax result which is not inconsistent with its economic consequences (unless specific legislation anticipates that result), nor contrary to the intentions of Parliament.
- Interpreting the relevant laws in a reasonable way, and ensuring transactions are structured consistently.
- Ensuring all interactions with HMRC are conducted in an open, collaborative and professional manner.

## Companies to which this strategy document relates

As the Hachette UK group of companies is part of a wider, global group, Lagardère SCA, the wider group's tax strategies are dealt with across other locations. It should be noted that these strategies do not directly affect the process of compliance with UK tax laws and regulations.

The wider group owns UK companies that are not under the control and responsibility of the Hachette UK group and, it is for this reason that a list of UK companies that this document covers are listed in the following appendix.

# Appendix – list of companies under the tax responsibility of the Hachette UK group as at 31st December 2017

Hachette UK (Holdings) Limited Company registration no.

03701589

The Orion Publishing Group Limited Company registration no.

02663988

Piatkus Books Limited Company registration no. 01413109 Octopus Publishing Group Limited Company registration no.

03597451

**Conran Octopus Limited** Company registration no.

01739383

Little Brown Book Group Limited Company registration no.

02304585

Littlehampton Book Services Limited Company registration no.

00250744

Company registration no. 02020173 Hachette UK Limited **Headline Publishing Group Limited** Company registration no.

02782638

**Bookpoint Limited** Company registration no.

00978415

**Hodder & Stoughton Limited** Company registration no. 00651692 Philip Allan Publishers Limited Company registration no.

01086222

The Watts Publishing Group Limited Company registration no.

03911258

**Chambers Publishing Limited** Company registration no. SC002048 Galore Park Publishing Limited Company registration no.

03866693

Rising Stars UK Limited Company registration no.

04246700

**Quercus Publishing Limited** Company registration no.

05437517

**Quercus Editions Limited** Company registration no.

05127683

Constable & Robinson Limited Company registration no.

02799815

Company registration no. 02675936 **NB** Limited Company registration no. **Neon Play Limited** 

07187620

Storyfire Limited Company registration no.

07893911

**Kyle Cathie Limited** Company registration no. 02427215 Company registration no.

Summersdale Publishers Limited

03419533

Jessica Kingsley (Publishers) Limited Company registration no.

02073602

Edward Arnold (Publishers) Limited Company registration no. 00522538 Hachette UK Pension Trust Limited Company registration no. 04434704 Hachette UK Distribution Limited Company registration no. 03541391 **Hodder & Stoughton Educational Limited** Company registration no. 03286205 John Murray Books Limited Company registration no. 04434719 New English Library Limited Company registration no. 00586668 Robert Gibson & Sons, Glasgow, Limited Company registration no. SC005175 **Updates Limited** Company registration no. 03600329 John Murray (Publishers) Limited Company registration no. 00492627 **Quercus Books Limited** Company registration no. 05338120 13114 Publishers Limited Company registration no. 01542205 **Arms & Armour Press Limited** Company registration no. 00916307 Arthur Baker Limited Company registration no. SC024615 Blandford Press Limited Company registration no. 01341172 **Blandford Publishing Limited** Company registration no. 01490020 **Brewers Publishing Company Ltd** Company registration no. 01256830 Cassell Educational Limited Company registration no. 01993768 Cassell Limited Company registration no. 02004498 Cassell Publishers Limited Company registration no. 02043304 **Contact Publications Limited** Company registration no. 00596127 George Weidenfeld & Nicolson Ltd Company registration no. 00395166 George Weidenfeld Holdings Ltd Company registration no. 00698701 J.M. Dent & Sons Limited Company registration no. 00331386 Mrs Beeton Industries Limited Company registration no. 01085673 **New Orchard Editions Limited** Company registration no.

01341559

Orion Books Limited Company registration no. 02701090 Orion Publishing Limited Company registration no. 00742993 Phoenix House (Publishers) Limited Company registration no. 02201445 **Rigel Publications Limited** Company registration no. 01109438 Victor Gollancz Limited Company registration no. 01944299 Ward Lock Limited Company registration no. 00201547 Ward Lock Publishing Limited Company registration no. 01127110 Weidenfeld & Nicolson (World University Library) Limited Company registration no. 00742992 Weidenfeld (Publishers) Limited Company registration no. 00472173 Weidenfeld Limited Company registration no. 01797028 **Futura Publications Limited** Company registration no. 00386574 Little, Brown and Company (UK) Limited Company registration no. 02260381 Sphere Limited Company registration no. 00887032 Swapequal Limited Company registration no. 02129991 Virago Press Limited Company registration no. 01118677 Robinson Publishing Limited Company registration no. 03875102 Magpie Books Limited Company registration no. 05144174 Elliot Right Way Books Limited Company registration no. 00813524 Cloverview Limited Company registration no. 00103767 Constable and Company Limited Company registration no. 07452655 **How To Limited** Company registration no. 03343531 How to Content Limited Company registration no. 07099715 How to Books Limited Company registration no. 02574996 Transita Limited Company registration no. 05235251 **Digital Octopus Limited** Company registration no. 04220493 **Digital Property Guides Limited** Company registration no.

04220495
FBB 1 Limited Company registration no. 00353434
London Property Guide Limited Company registration no.

London Property Guide Limited Company reg 04240399 Map Productions Limited Company registration no.

00832609

Millers Publications Limited Company registration no. 01527729

Mitchell Beazley International Limited Company registration no.

00957334

Mitchell Beazley Limited Company registration no.

03611943

Octopus Books Limited Company registration no.

01400692

Spring Books Limited Company registration no. 01249958

The Hamlyn Publishing Group Limited Company registration no.

00521989 TLF Limited

TLF Limited Company registration no. 00549985 Kyle Books Limited Company registration no. 07594515