

## Motor Fuel Group Tax Strategy

### Introduction

Motor Fuel Group is the largest independent forecourt operator in the UK with around 900 stations operating under the BP, Shell, Esso, Texaco, JET and Murco fuel brands.

Paragraphs 19(2) and 22(2), Schedule 19, Finance Act 2016 requires the Group to set out the tax strategy of its UK companies listed in Appendix 1. This strategy covers all taxes and relates to the year ending 31 December 2020.

This tax strategy document, approved on 27 October 2020 by the Board of CD&R Tiger Holdco (Jersey) Ltd summarises the Group's policy and approach to managing its tax affairs and how it deals with tax risks. It was published on 4 November 2020 and will be reviewed annually by the Audit Committee and Board and is made freely available to the public.

### MFG's Tax Mission Statement

The MFG group aims to:

- observe at all times relevant tax laws, rules, regulations, reporting and disclosure requirements,
- ensure that the Tax Strategy and Code of Conduct is aligned with the Group's business and commercial strategy
- develop and foster proactive and transparent working relationships with all tax authorities and government bodies to minimise the extent of disputes, to achieve early agreement on disputed issues when they arise, and achieve certainty, wherever possible,
- when considering tax, ensure due consideration is given to the Group's overall strategy relating to corporate governance, internal risk management, social responsibilities and the value it places on engendering community trust,
- act with integrity and transparency at all times and to be trusted by all our business partners and stakeholders.

### Key roles and responsibilities

The Chief Finance Officer (CFO), who is a member of the Board, is ultimately responsible for the Group's Tax Strategy and Code of Conduct and is also the Senior Accounting Officer.

The finance team is responsible for managing the Group's tax compliance obligations. Day to day tax responsibilities fall to the Group tax manager who reports to the Director of Group Financial Control and is overseen by the CFO. All three members in the tax reporting line hold recognised accounting qualifications.

MFG use reputable external tax advisors to provide tax technical expertise and additional resource based on an assessment of risk and requirements, such as:

- Advice on technical matters and uncertainties
- Advice on the tax impact of any significant changes to the business
- Assistance with tax filings including any relevant claims for tax incentives

## **Relationship with Her Majesty's Revenue & Customs (HMRC)**

MFG's management of relationships with tax authorities is consistent and is defined within the Group's Tax Mission Statement and Tax Code of Conduct, namely:

1. MFG aims to be open and transparent with tax authorities
2. MFG aims to ensure compliance with all relevant legal disclosure requirements
3. MFG aim to maintain a strong and pro-active relationship with tax authorities
4. MFG will disclose any material errors identified in tax filings to HMRC in a timely manner

## **The Group's tax risk profile**

MFG recognise that the volume and complexity of transactions within the group, together with the recent acquisition and recent developments in the external environment that has raised the profile of tax, has resulted in an increased level of tax scrutiny from tax authorities and other stakeholders. Despite this, given the size and nature of the business with limited international tax exposure and the relative simplicity of the business model, the group considers the tax risk profile to be low overall.

## **Management of UK tax risk**

Managing tax risk is important for the Group and a tax risk and controls matrix is maintained. The output from the risk and control matrix provides an immediate comparison of the tax risk and control environment across the Group and enables the Group to prioritise and remediate controls gaps quickly and effectively.

Tax risks are highlighted to the Director of Group Financial Control and the wider finance team and discussed at Director and Board level.

## **Tax planning**

The Group will not enter into transactions designed principally to give a tax advantage. Any tax reliefs and exemptions are claimed based on advice from external tax advisors and in accordance with the spirit of the tax legislation and HMRC guidance where relevant.

## **Appendix 1 – MFG UK tax registered companies**

BNV Limited  
Burns & Co. Limited  
CD&R Firefly 2 Limited  
CD&R Firefly 3 Limited  
CD&R Firefly 4 Limited  
CD&R Firefly Bidco Limited  
CD&R Firefly Holdco Limited  
Chartman Holdings Limited  
Chartman Limited  
Elite Fuels Limited  
Fuel Stop (UK) Limited  
Gold Star FSL LLP  
Goldstar Fuel LLP  
Haley Hill Service Station Limited  
Highway Stops Limited  
Isle of Wight Fuels Limited  
Kennet Limited  
Kerr 1 Limited  
Kerr 2 Limited  
Leopard No. 2 Investments Limited  
Leopard PEL Limited  
LSF9 Robin Investments Limited  
LSF9 Robin Midco Limited  
LSF9 Robin Newco 1 Limited  
LSF9 Robin Newco 2 Limited  
LSF9 Robin Topco Limited  
Lupo Limited  
Malthurst (UK) Limited  
Malthurst Anglia Limited  
Malthurst Estates Limited  
Malthurst Limited  
Malthurst Petroleum Limited  
Malthurst Properties Limited  
Malthurst Retail Limited  
Malthurst Services Limited  
Malthurst South East Limited  
Malthurst Fuels Limited  
Manor Service Stations Limited  
Matrix (Highlands) Limited  
Mercury Forecourts Limited  
Motor Fuel (No. 1) Limited  
Motor Fuel (No. 2) Limited  
Motor Fuel (No. 3) Limited  
Motor Fuel (No. 4) Limited  
Motor Fuel (No. 5) Limited

Motor Fuel (No. 6) Limited  
Motor Fuel Group Limited  
Motor Fuel Limited  
MRH (GB) Limited  
MRH Forecourts Limited  
Peregrine Retail Limited  
Refined Estates Limited  
Refined Estates Trading Limited  
Refined Holdings Limited  
Refined MP Limited  
Refined Petroleum Limited  
Refined Petroleum Trading Limited  
Retro Properties Limited  
RFF Limited  
Roadside Group Limited  
Scimitar Midco Limited  
Scimitar PFS 1 Limited  
Scimitar Topco Limited  
Scorpion Midco Limited  
Scorpion PFS 1 Limited  
Scorpion Topco Limited  
Spring Petroleum Company Limited  
St Albans Dealership Company  
Limited  
St Albans Operating Company  
Limited  
Tiger Jersey Holdco Limited