

The Medical Protection Society Limited Tax Strategy

Introduction

This document sets out the relevant aspects of the tax strategy of The Medical Protection Society Limited (MPS) and its subsidiary companies (together “MPS group”). The strategy is relevant to all taxes applicable to MPS group.

Ownership of the strategy rests with the Council of MPS; the Council reviews the strategy at least annually and is responsible for its approval before publication.

Monitoring of the application of the strategy is the responsibility of the Council’s Management Oversight Committee, with executive responsibility delegated to the Executive Director – Finance. The MPS finance team is ultimately accountable for the implementation of the strategy and ensuring it is followed by all relevant areas of the group.

One objective of the tax strategy is alignment with MPS’s wider vision: “We will provide the most expert, trusted and valued protection to enable our members around the world to deliver healthcare”. MPS is expected to demonstrate appropriate responsibility and accountability in all aspects of its operations, including taxation, whilst recognising that a mutual organisation like MPS must act in the collective best interest of its members at all times.

This strategy is published in accordance with paragraph 16 of Schedule 19 to the Finance Act 2016 (Duty to publish a group tax strategy).

Managing the tax risks of MPS group

Given the nature of MPS group, its tax risks require careful review and management. This process begins with the finance team, which analyses operational tax risks. Significant issues are escalated to the Executive Director – Finance, who in turn has discretion to seek guidance and direction from the Council or one of its sub-Committees. Tax risks are recorded on the MPS group Risk Register and are subject to review. Significant risks are reported to the Executive Committee and the Audit and Risk Committee.

MPS group seeks advice from external sources to manage tax risks; such sources include international accountancy firms, lawyers and, if required, senior tax counsel. These external advisers are utilised in order to ensure that MPS group is following and interpreting tax rules and legislation appropriately and to ensure that MPS group is acting within the spirit and direction of tax laws.

MPS group adopts standardised internal control systems and procedures across all its financial activities, including tax compliance matters; care is taken to ensure the integrity of all reported tax numbers and associated disclosures.

Procedures and controls across MPS group, including those specifically related to taxation, are subject to periodic internal audit review, as well as wider annual external audit. The executive management of MPS group is accountable to the MPS Audit and Risk Committee with regards to the timely and effective resolution of all audit recommendations (internal and external).

MPS group's attitude to tax planning

MPS group will not seek to construct transactions or structures, the sole purpose of which would be to reduce its exposure to tax. MPS group will seek to ensure that its transactions are managed in a way that achieves an appropriate level of efficiency, but always within the spirit and direction of tax laws. As a mutual organisation, MPS has a responsibility to safeguard its members' funds, and therefore approaches taxation and related transactions in a commercially responsible manner.

MPS group does not employ internal or external advisers to actively seek tax planning opportunities; rather its use of such resources is to ensure that tax is paid appropriately and only as required by law. There will be occasions when MPS group's interpretation of tax law may differ from that of tax authorities. MPS group will only defend its position where it believes there is a strong business and tax case. MPS group endeavours to avoid disputes and will look for resolution without recourse to the courts whenever possible.

MPS has several non-UK entities, which have been incorporated only where there is significant business need. MPS group works with local tax advisors to ensure that all taxes are accounted for and paid in accordance with both local tax legislation and transfer pricing legislation.

Tax risks of MPS group

MPS group has an objective to maintain a low level of tax risk; it aims to ensure that all returns are prepared with adequate supporting evidence of decisions taken and controls applied, and that they are filed on or before all relevant deadlines. Payments are also made on or before required deadlines. Where estimated payments are required, the calculation of these is fully documented; with such supporting documentation being available to HMRC as well as internal and external audit, should it be required.

A particular area of risk for MPS group is the complex legislation relating to the taxation of income and gains from its investment portfolio. The treatment is reviewed annually for each investment within the portfolio in conjunction with external tax advisors.

Tax risks are minimised by implementing robust tax processes and controls, and by ensuring that business areas involved in managing these processes are adequately resourced and trained. Talent management and development, along with colleague retention and effective succession planning, are all key aspects of MPS group's wider people strategy.

How MPS group works with HMRC

It is always the aim of MPS group to be open and honest in its dealings with HMRC and other tax authorities globally, which is demonstrated through willingness to:

- ✓ engage in face-to-face meetings when required
- ✓ seek pre-transaction clearance when appropriate
- ✓ make tax compliance procedure, control and other supporting documentation available on request, and
- ✓ seek constructive resolutions to disputes and potential areas of dispute, particularly with regards to the interpretation of law.

The Medical Protection Society Limited

[medicalprotection.org](https://www.medicalprotection.org)
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The Medical Protection Society Limited (MPS) is a company limited by guarantee registered in England with company number 00036142 at Level 19, The Shard, 32 London Bridge Street, London, SE1 9SG.

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