

Jemca Car Group – UK Tax Strategy

Publication overview

This document sets out the tax strategy adopted by Toyota Tsusho Automobile London Holdings Limited and subsidiary entities Jemca Car Group Limited and Toyota Tsusho Automobile South London Limited (together “the Group”). This document and the principles set out relates to the financial year to 31 March 2024.

This document has been published in accordance with paragraph 19(2), Schedule 19 of the Finance Act 2016.

UK Tax Risk Management and Procedures

Our business has a strong focus on corporate responsibility, and a key part of this is responsible administration and payment of taxation. Our tax strategy is driven by our culture and our values as set out in the wider group’s Code of Conduct & Ethics (“COCE”). Employees, across all grades, have agreed to follow the COCE which is readily accessible on the local intranet as well as being published online.

It is the fundamental policy of the Group, under the responsibility of the Group’s President, to comply with the tax laws and tax regulations in the UK, as well as contribute towards appropriately satisfying global tax obligations.

These principles have also been communicated to the Group Finance Team and the Senior Accounting Officer. The Group Finance Team is responsible for the implementation of the tax strategy, the tax control framework and ensuring the finance team has the necessary training, skills and support to implement the Group’s tax strategy.

We want our tax affairs to be transparent and compliant with tax legislation and recognise that managing tax compliance is increasingly complex. Our internal structure is set up to ensure:

- There is a consistent dialogue between the Board and those individuals tasked with the operation of our finance function, regarding the way our business manages its tax risk.
- The business portrays a positive view towards tax compliance and the importance of meeting our obligations.

We keep under review how we meet our tax obligations, by seeking external tax advice and investing in appropriate training for our staff.

Attitude to Tax planning

Emphasis is placed on conducting business activities appropriately and rationally in line with business objectives and our COCE. The Group does not undertake any artificial transactions with the sole purpose of obtaining a tax advantage.

The Group has a responsibility to minimise tax risk and exposure to negative publicity through non-compliance. Led by our internal policies, we strive to eliminate double taxation and appropriately utilise tax incentives to achieve an appropriate and fair effective tax rate in the manner intended by Parliament.

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 our decision-making process.

Level of risk accepted for UK taxation

As a large business part of a wider international group, the Group is inevitably exposed to a level of tax risk and uncertainty. The Group recognises this and attempts to mitigate risks and uncertainty where possible through clear tax policies, procedures and internal controls.

The Group describes itself as risk adverse regarding taxation matters and takes a low-risk approach when considering significant transactions consistent with our COCE and overall tax strategy.

Working with HM Revenue & Customs (“HMRC”)

The Group works collaboratively with HMRC and acts in an open and honest way. It appropriately discloses information and engages in constructive dialogue. As far as reasonably possible, the Group complies with all the disclosure obligations required of it by HMRC.

We employ the services of professional tax advisers to act as our agents, and in a number of cases they liaise with HMRC on our behalf. This is to ensure we get the most out of our relationship with HMRC, as well as manage and mitigate tax risk.

Where there is any uncertainty on a significant transaction the Group will consider seeking any available pre-transaction clearances from HMRC, in order to gain proactive agreement on the tax implications, and to achieve certainty wherever possible. If a dispute on any tax matter were to arise the Group will aim to promptly resolve the matter with HMRC in a fair manner.

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