

# Socius Pharma Ltd Tax Strategy

The tax strategy of the Socius Pharma Ltd group was reviewed by the Board in December 2023.

## Introduction

The following sets out the strategy adopted by Socius Pharma Ltd and its subsidiaries (the 'Group') in dealing with the tax affairs for the year ended 30 April 2024 and is published in accordance with paragraph 16(2), Schedule 19 of Finance Act 2016. This strategy, which is reviewed and refreshed annually, covers all UK taxes as set out in the appendix.

## Governance and Risk Management

The Board sets out the overall strategy of the Group in relation to Taxation, with overall responsibility for oversight of the tax affairs of the Group delegated to the Chief Financial Officer. The Chief Financial Officer is also the Senior Accounting Officer for all Group entities.

The day-to-day management of the Group's tax affairs is dealt with centrally by the Chief Financial Officer. In addition, the Group uses a panel of appropriately qualified external advisors to provide additional tax support and advice where the Group does not have appropriate in-house expertise or resource, or where the position is complex.

The Chief Financial Officer meets with other directors and other senior managers throughout the year to review the tax risk and controls processes within the Group, as well as to discuss all other aspects of taxation. Furthermore, the Board receives regular updates of the tax position, including a summary of all HM Revenue and Customs ("HMRC") activity, and will discuss taxation at other meetings periodically throughout the year.

## Tax Cash Flow Management

The Group will ensure that it meets its obligation to pay the "right amount of tax at the right time". The "right amount of tax" is the correct amount of tax legally due in any territory, in accordance with the legislation enacted by its government.

## Tax Risk

Strategies and procedures to control and manage tax risk will be adopted, thereby minimising the risk that tax positions are misstated to tax authorities.

The Group has a low appetite for tax risk and seeks to have a good relationship with HMRC. The Group also seeks to obtain certainty on any transactional tax risk, particularly in relation to complex transactions. As a result, where after taking appropriate external advice, if the position is not free from doubt, it is discussed with HMRC at an early stage with a view to seeking clarity on the tax position.

## Tax Planning Arrangements

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Whilst the Group has a responsibility to its shareholders to deliver value, it also recognises its broader, social responsibilities to pay the right amount of tax at the right time.

The commercial needs of the Group are paramount, and all tax planning will be undertaken in this context.

As such the Group will not enter transactions that serve no commercial purpose other than reducing the tax liabilities of the Group. However, where commercial transactions are being entered into, the Group will take advantage of any reliefs and exemptions, as set out in the legislation, to minimise its tax liabilities.

## Disclosure

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Compliance with all relevant disclosure and tax authority approval requirements will be adopted by the Group. All information will be fully disclosed and clearly presented to tax authorities or other relevant bodies, as appropriate.

The Group aims for certainty on the tax positions it adopts.

Where tax law is unclear or subject to interpretation, the treatment of an item will be based on the “more likely than not” standard, such that the item will be settled in our favour if it is enquired into.

Where the tax treatment of an item is so uncertain and/or unquantifiable such that the “more likely than not” assessment is not possible, robust risk assessment and documentation will take place to support the full disclosure made to tax authorities.

## Effective Tax Rates

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The Group does not have a target effective tax rate applicable to its corporate income and deferred tax positions as recorded in its financial statements. All the profits of the Group are subject to full UK corporation tax which, together with the recognition criteria for tax in the applicable accounting standards, drives the effective rate of tax reported by the Group.

## Tax Authority Relationships

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We will develop and foster good working relationships with tax authorities, government bodies and other related parties. Openness, honesty, and transparency will be paramount in dealings with tax authorities and other relevant bodies.

The Group is in regular contact with HMRC, the UK tax authority, across all applicable taxes, regarding developments in the business, interpretation of legislation and guidance, and in relation to existing or future tax risks.

The Chief Financial Officer meets formally with HMRC as required.

## Tax Disputes

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Tax disputes, if they arise, will be pro-actively managed. We will undertake all dealings with tax authorities in a professional, courteous, and timely manner.



Signed

Julie Sherry

Chief Financial Officer

December 2023

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## Appendix

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The UK taxes covered by this strategy, in accordance with paragraph 15(1), Schedule 19 of Finance Act 2016, are:

- income tax
- corporation tax, including any amount assessable or chargeable as if it were corporation tax or treated as if it were corporation tax
- value added tax
- amounts for which the company is accountable under UK PAYE regulations
- diverted profits tax
- insurance premium tax
- annual tax on enveloped dwellings
- stamp duty land tax
- stamp duty reserve tax
- petroleum revenue tax
- customs duties
- excise duties
- national insurance contributions.