

# Tax Strategy

At Simmons & Simmons (the Group), we operate according to the highest ethical and professional standards, consistent with our reputation as one of the world's leading and most trusted law firms. We take our responsibilities to our clients, our people, our suppliers and the communities in which we do business extremely seriously.

The Group places a high level of importance on the management of all areas of risk. We recognise that the management of risk, including that relating to tax, is fundamental to the sustainability of our business. As such, the Group is committed to operating in a manner that ensures compliance with all relevant laws and regulations, including those relating to its tax activities. **We are committed to paying the right amount of tax, in the right countries, at the right time.**

This document, as approved by the Group's Chief Financial Officer; General Counsel; Audit Committee and its Board, sets out the Group's approach to managing its tax compliance obligations and controlling areas of tax risk. This strategy is publicly available to allow all interested parties to understand our approach in dealing with our own tax affairs and is compliant with the requirements set out in paragraphs 16 and 25 of Schedule 19 Finance Act 2016. This policy applies to Simmons & Simmons LLP and all UK affiliated entities for the financial year ending 30 April 2026 and applies to all subsequent years until superseded.

## Compliance & Reporting

We strive to ensure that all statutory filing requirements are met and all tax payment obligations are settled in full and on time. We have a designated tax team of experienced professionals who work alongside our external tax advisors, to satisfy these requirements in a timely manner.

## Tax Planning

We claim tax reliefs and incentives where appropriate, but we do not operate in a manner that contradicts the true purpose of any tax legislation. Where a tax position is uncertain, we seek advice from professional advisors and / or raise the issue with the relevant tax authorities (HMRC in the UK).

All actions undertaken are based on sound commercial reasoning and economic substance. We do not engage in any artificial structures or contrived transactions.

## Risk Management

We work to identify all key tax risks promptly and put in place the appropriate control framework to facilitate the diligent management of such issues. We operate in many different jurisdictions internationally and will always consider the tax implications of doing so, taking advice from local tax experts as well as UK advisors where necessary, to ensure that the full implications on all tax positions, including those in the UK, are fully considered and accounted for.

The Risk Committee has responsibility for addressing tax risks and determining what actions should be taken to manage those risks, taking into consideration the potential impact on the Group's reputation and impact on our clients, our people, our suppliers and the communities in which we do business.

## Working with tax authorities (including HMRC)

Within the UK, we have established a constructive, professional, and transparent relationship with HMRC through their Customer Compliance Manager program. We collaborate with them in order to deal with our tax affairs in an open and transparent manner and meet with them on a regular basis so that they have a complete understanding of our business and our tax affairs. This approach is applied when dealing with the tax authorities in the other jurisdictions in which we operate.

## Governance

The firm's designated tax team of appropriately qualified and experienced professionals both manage the UK tax position and monitor the tax position in all other countries in which the Group operates. This tax team reports to the Group Finance Director. All our tax procedures and policies are approved by the Group's Chief Financial Officer and our General Counsel and are also conveyed to the partners who are expected to follow such procedures and policies. We also engage with best in-class external tax advisors in each jurisdiction in which we operate.

As set out above this document has been approved by the Group's Chief Financial Officer; General Counsel; and Risk Committee. The Group's Chief Financial Officer reports on any tax risks and is invited to attend the relevant Risk Committee meetings. The General Counsel is a member of the Risk Committee. The Risk Committee provides updates to the Board, which is the ultimate owner of this tax strategy and has strategic oversight of the management of tax risk.

For additional information on our firm, please visit our website at [simmons-simmons.com](https://www.simmons-simmons.com).

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