

CapitaLand Investment UK Tax Strategy

CapitaLand Investment Limited (CapitaLand Investment) has operations in more than 40 countries and more than 220 cities. Our investment and asset management professionals are supported by our expansive, worldwide team of operational personnel.

CapitaLand Investment has investments and operation platforms in the UK and this webpage describes our UK Tax Strategy and is applicable to all our UK incorporated and UK tax resident companies as listed in the following Annex.

Tax governance and risk management

We aspire to the highest standards of corporate governance and are committed to regularly improving our corporate governance practices. This approach provides the foundation for our UK Tax Strategy. Overall responsibility for the management of risk (including tax risk) lies with the CapitaLand Investment Board, which ensures that management maintains a sound system of risk management and internal controls. As part of CapitaLand Investment's Enterprise Risk Management ("ERM") Framework, CapitaLand Investment Group UK teams perform a risk and control self-assessment annually to identify, assess and manage material risks, which may include tax risk; and report any regulatory non-compliance quarterly to Singapore Head Office. Any material risks and non-compliance will be reviewed by CapitaLand Investment's Risk Committee and, where appropriate, the Audit Committee, and be reported to the Board.

Commitment to compliance

We are committed to meeting our UK tax compliance obligations and ensuring that any transactions between our related entities are undertaken in accordance with UK transfer pricing rules. UK tax compliance is delivered through a combination of in-house staff and outsourced tax compliance service providers. Through training and our commitment to developing high performing people, we look to manage the risk associated with compliance activities that are performed in-house. Our outsourced tax compliance service providers are all from reputable firms and are experts in the services provided.

The respective Head of Finance/Financial Controller in-charge of CapitaLand Investment Group UK companies maintain close oversight of the day-to-day UK tax compliance activities, reviewing and approving all tax reporting, returns and payments. CapitaLand Investment's Group Tax team in Singapore also provides strategic support and guidance, and oversees group-wide compliance obligations such as country-by-country reporting.

Tax planning

It is our mission to deliver sustainable shareholder returns in a responsible manner. As part of our appraisal of UK investments, we seek to understand the tax consequences of the investment, the operational returns and any subsequent disposal. Whilst different investment structures will have different UK tax consequences, our focus is on responsible tax efficiency. The UK investment structures we adopt are well understood and common in the industry. Both CapitaLand Investment Group UK and Head Office Finance teams and CapitaLand Investment's Group Tax team are involved in the investment appraisal process, guided by the tax advice that we obtain from reputable professional UK tax advisors.

Tax risk appetite

With support from reputable professional UK tax advisors, we seek to manage risk in our tax planning and compliance activities within CapitaLand Investment's Group Risk Appetite Statement, incorporating the Group's risk limits. Where tax law is complex or requires interpretation, we will engage HM Revenue & Customs ("HMRC") to seek clarifications where appropriate, and will also engage in constructive discussion with HMRC to resolve any differences.

Relationship with HMRC

Our relationship with HMRC is established in line with our core values of mutual trust and respect. We have a transparent and collaborative relationship and a strong track record of compliance.

This tax strategy has been approved by CapitaLand Investment Group Chief Financial Officer. Our publication of this tax strategy is for the purposes of complying with paragraphs 19(2) and 22(2) of Part 2 of Schedule 19 of the 2016 Finance Act for the period ended 31 December 2023.

Entity Name
Ascott Hospitality Management (UK) Limited
Citadines St Marks Limited
The Ascott Mayfair Operating Limited
Ascott St James (Jersey) Limited
The Cavendish Hotel (London) Limited
Soderetour UK Ltd
FBM London Ltd
Citagrep Limited
CL International Management (UK) Limited
Arlington Business Parks (Reading) Management Limited
Synergy Global Housing (United Kingdom) Limited
Quest Apartment Hotels UK Group Limited
Quest Apartment Hotels UK Operations Limited
Quest Liverpool UK Operations Limited
Quest Apartment Hotels UK Limited
Quest Liverpool Tenancy UK Limited
Quest Manchester MediaCityUK Limited