

TAX POLICY

POLICY STATEMENT

At M&S, Tax is governed by a Board approved governance framework under which the Chief Finance Officer and the Director of Group Finance are responsible for overall management of M&S' tax affairs.

BACKGROUND

With ever increasing coverage of multinationals paying disproportionate low levels of tax in jurisdictions where significant profits are earned, there is growing scrutiny from media and Tax authorities alike to ensure the correct amount of tax is paid by businesses.

In the UK, we are also required to publish our Tax Strategy by law.

OUR COMMITMENT

In our commercial business activities, our commitment is to ensure that tax is properly considered so that we remain compliant with relevant tax laws. We will not seek to undertake contrived or artificial transactions (including the use of marketed or abusive schemes) or those with no commercial or economic substance.

We seek to ensure that our taxes are managed in a sustainable manner with a high degree of integrity. Our approach seeks to ensure that:

- tax matters are proactively managed by having a clear internal governance framework, robust business controls and processes, and maintaining an open and regular dialogue with the tax authorities;
- we are fully transparent and comply with the law so that tax returns and payments are made on time and proper disclosure is made to the tax authorities; and
- we properly reflect tax considerations in our commercial business activities.

COMPLIANCE

This Tax policy is targeted at shareholders, employees and Tax authorities alike. We will engage with tax authorities, including HMRC, on a regular and open basis in the spirit of co-operative compliance. Group policy requires proper disclosure of tax matters to all tax authorities. Consistent with our corporate code of ethics, concealment or deliberate non-compliance is never acceptable.

In view of the size and complexity of our business, on occasions we may have differences of opinion with the tax authorities on the interpretation of the law relating to particular transactions. If this happens, we will seek to resolve such differences of opinion through discussion and negotiation.

It is accepted that non-compliance with the Tax policy will result in a range of issues from a non-cohesive relationship with tax authorities, to a tarnished business image and dissatisfied shareholders and employees.

The Chief Financial Officer is responsible for the overall compliance with the Tax policy with delegated responsibility for reporting on compliance managed by the Head of Tax.

REPORTING AND QUERIES

Stakeholders can raise concerns and queries with the Head of Tax.

FURTHER INFORMATION

Policy Owner	CFO
Compliance Lead	Head of Tax
Published / Effective from	March 2024
Review frequency	Annually
Next review date	March 2025