Statement of Tax Principles

DERWENT
LONDON

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Introduction

Derwent London plc is the largest central London focused Real Estate Investment Trust (REIT). Our property portfolio is focused on design-led, innovative central London offices. In total, West End properties make up about two thirds of our portfolio, with key ownerships in Mayfair, Marylebone, Victoria, Soho/Covent Garden, Fitzrovia and Paddington. The balance is held in the 'Tech Belt' area skirting the City.

Our portfolio of commercial property also includes mixed-use buildings (which may incorporate a retail or residential element) purchased for the purpose of land assembly to provide future development opportunities, including the provision of affordable housing to meet relevant planning requirements. The registered ownership of the portfolio is within the various Derwent London subsidiaries. We take our obligations as a taxpayer very seriously, and focus on ensuring that, across the wide range of taxes that we deal with, we have the governance and risk management processes in place to allow us to meet all our continuing tax obligations.

As a large business and employer, we account for and pay a wide range of taxes including Corporation Tax, VAT, Stamp Duty Land Tax, Pay As You Earn income tax and National Insurance for our employees, and environmental taxes. As a REIT, we pay corporation tax on non-property income and gains, including gains we make on the disposal of shares. However, we are exempt from Corporation Tax on property income and on capital gains on the disposal of most of our property investments. The principle behind REIT taxation is that the incidence of taxation on property income and gains should be at investor level only. We are required by tax legislation to distribute to our investors at least 90% of our rental profits as computed for tax purposes as property income distributions and our investors pay tax on these distributions (and on any gains that are distributed) according to their status, as if they were in receipt of a share of the property income directly, rather than as ordinary dividends. Our investors will also pay tax according to their status on gains they make when they sell their shares which will generally reflect the underlying increase in value of our property investments.

Note: **This document is produced by Derwent London plc on behalf of all qualifying group entities pursuant to paragraph16(2) Schedule 19, Finance Act 2016 for the financial year ending 31 December 2021**

Risk Management and Governance arrangements in relation to taxation

The governance of our business is led by the Board of Directors, which is committed to ensuring that Derwent London continues to meet its business, financial and sustainability objectives. The Board of Directors also has overall responsibility for governance, risk management and any decisions made in relation to taxation.

All of our property activities are located in the UK and we are committed to ensuring we pay the right amount of tax in the UK when it falls due. Our tax strategy is focused on four key objectives: maintaining our REIT status; ensuring that we meet all of our UK tax compliance, filing and payment obligations; fulfilling the Senior Accounting Officer (SAO) obligations in relation to ensuring that our tax accounting arrangements are appropriate; and continuing to be considered by HM Revenue & Customs (HMRC), the UK's taxing authority, as a business with a low risk.

The Head of Tax and the Finance Director (who is also the group's SAO) are key to ensuring that the tax strategy is achieved. Together they are responsible for all taxes which impact the business including all taxes arising in respect of transactions. Day to day administration of these taxes is delegated to suitably trained members of the finance team – with appropriate internal review procedures – and the input of qualified external tax advisors where necessary.
The Head of Tax and Finance Director report to the Board on the tax consequences of all significant commercial transactions as part of the due diligence considerations on the transactions in question. Appropriate and regular oversight is also provided by the Audit Committee and Risk Committee[1] which publishes reports as part of Derwent London plc's wider Annual Report. An appropriate policy has been drawn up and risk assessment completed, in relation to the corporate offences of failure to prevent the criminal facilitation of tax evasion, contained in Part 3 of the Criminal Finances Act 2017.

The level of risk in relation to taxation that we are prepared to accept

Our attitude towards tax risk is primarily governed by the Board's objectives to retain our REIT status and our low-risk rating from HMRC. We have a low tolerance towards tax risk, and do not undertake transactions led by a tax planning purpose.

Additionally, when considering tax risk, the Board will take into account the views of our stakeholders (our employees, investors and commercial partners) as well as the likely views or perceptions of third parties such as HMRC and the general public.

Our attitude towards tax planning

All tax planning that we undertake considers any tax reliefs or opportunities available to us that are clearly within the spirit of the legislation and related HMRC guidance. The bedrock of our approach is that any tax planning we undertake should not compromise either our REIT status or our low risk status with HMRC.

We seek tax advice from external advisers in the normal course of our business on a range of matters, primarily to audit our controls and processes across all taxes, provide advice on transactions and to audit any tax disclosures within our Sustainability Report[2] . We retain significant in-house tax knowledge and we are able to utilise this expertise in the management of our tax-related obligations, and in maintaining a robust internal review process which ensures that we meet our filing obligations and other tax requirements, in line with the objectives which underlie the Board's tax strategy.

[1] https://www.derwentlondon.com/investors/governance/board-committees
[2] https://www.derwentlondon.com/sustainability/performance/reports

Our approach towards our dealings with taxing authorities

As a large business in the UK within the UK tax authority's Large Business directorate, Derwent London plc is assigned a customer compliance manager (CCM) within HMRC. We have an open relationship with our CCM, communicating on a regular basis through a combination of email, telephone and face to face meetings. We aim to be open, helpful and transparent in our dealings with HMRC.

We seek to anticipate any tax risks at an early stage, including clarifying areas of uncertainty with HMRC as they become evident. We consider this collaborative approach to our relationship with the UK taxing authority to be fundamental to delivering our Board led tax strategy

Summary

It has been a priority over recent years to build our tax strategy and risk management framework, which has led to our achieving each of the Board's four tax strategy objectives. We are committed to maintaining this in future.

Derwent London plc
December 2021