NUFFIELD HEALTH TAX STRATEGY 2025

1. Introduction

1.1 This statement sets out Nuffield Health's UK tax strategy and is published in accordance with Schedule 19, Part 2, Paragraph 22 of the Finance Act 2016. The Strategy applies for the financial year 2025 and was approved by the Board Audit & Risk Committee (BARC) in September 2026.

1.2 Nuffield Health is one of the leading not-for-profit healthcare organisations in the UK. The vast majority of the Group's activities are undertaken by Nuffield Health, a registered charity in England and Wales and in Scotland (charity number 205533)

1.3 The management of tax risks is integrated into Nuffield Health's wider risk governance and risk management framework, with oversight ultimately provided by BARC.

1.4 Ethical behaviour is one of the four elements of our values framework and applies equally to our approach to tax. We seek to act in a manner that is consistent with our charitable purpose and organisational values.

1.5 As a charity, Nuffield Health benefits from tax reliefs. We will apply those reliefs where available and appropriate in order to reduce costs and further our charitable aims.

1.6 Nuffield Health complies with tax law, seeks to pay the correct amount of tax at the right time, and maintains an open and constructive relationship with HMRC.

2 How UK tax risks are managed

2.1 Tax compliance and reporting is managed by the Financial Control and Accounting directorate, with oversight from the Chief Financial Officer. The directorate has allocated responsibilities for tax processes and controls.

2.2 Tax matters are reviewed by Senior Tax Manager, taking into account the relevant facts, applicable legislation and the charity's purpose. Where there is uncertainty or complexity, issues are discussed internally and, where needed, external advice is sought to support sound decision making. This approach helps ensure that our tax treatment is in line with both the intent and requirements of the law, as well as Nuffield Health's ethical standards.

2.3 Nuffield Health operates within an established control and assurance environment that supports effective tax compliance and risk management. Tax processes are embedded within broader financial controls, with clearly allocated responsibilities, periodic review, and oversight by senior leadership and governance bodies.

2.4 Nuffield Health takes a pragmatic approach to managing risk across all operational areas. We actively seek to identify, evaluate, and minimise tax risks. Controls and processes are in place to ensure tax risk is considered as part of the decision-making process in respect of all new activities and projects. Any individual may report perceived or actual tax risks using the risk reporting processes or directly to the Senior Tax Manager.

2.5 In line with our Risk Management Policy, all identified tax risks are recorded on a risk register with each risk having a single owner who is responsible for ensuring their risk is measured, managed, monitored and correctly reported. Risk Owners are responsible for measuring the severity of their risks using our impact and likelihood scoring criteria and for recording the mitigating controls and any planned corrective action, which is then reviewed and challenged by Senior Leaders on a regular basis.

Depending on their severity, tax risks are escalated to the quarterly Risk & Governance Board which will then determine whether any risks or issues should be reported to the BARC.

2.6 Management of tax risks includes:

- appropriate training of staff whose roles and responsibilities have an impact on tax compliance,
- clearly setting out our intolerance to tax evasion in our Business Ethics Policy and mandatory staff training having
- proportionate processes and controls in place to ensure compliance with tax laws,
- internal audit and external tax advisors periodically test the tax areas with high inherent risks,
- obtaining professional advice for complex issues and/or areas of uncertainty,
- working or liaising with HMRC where appropriate.

3. Our attitude to tax planning

3.1 As a large UK-based charitable group, Nuffield Health's tax profile is primarily characterised by its core healthcare and wellbeing activities, together with the use of available charitable reliefs to support its mission. The Group's tax affairs are therefore relatively straightforward, focused on compliance with applicable UK taxes and the appropriate application of charity-specific tax rules.

3.2 As a charity, we will access the relevant charity reliefs that are available in order to reduce our costs and further our charitable activities.

3.3 Nuffield Health will not consider nor put into place any arrangements that are contrived or artificial in order to obtain a tax advantage.

4 The level of tax risk that we are prepared to accept

4.1 Nuffield Health is not prepared to accept risks related to tax evasion or non-compliance with tax legislation and seeks to manage these risks through controls and mitigating actions. Where there are uncertainties in relation to the understanding or interpretation of tax legislation, we will consider contacting HMRC in order to gain clarity or certainty on the tax position or seek specialist external tax advice.

4.2 More generally, any level of risk acceptance related to our financial processes would be determined through Nuffield Health's Risk Appetite which is a key component of our Risk Management framework and is determined by the Executive Board and validated by the BARC.

5 Our approach to working with tax authorities

5.1 Nuffield Health believes in constructing and maintaining a good relationship with the tax authorities, which involves engaging with the tax authorities in an open and honest way and informing them of significant changes in our activities.

5.2 Errors do occur and these will be corrected and, where required, reported to the tax authorities as soon as the full extent of the error is known.

5.3 Nuffield Health will endeavour to reach agreement with the tax authorities; in the event of a disagreement, we will enter into dialogue with the view of reaching a mutually acceptable and agreed position.