The Dun & Bradstreet Group UK Tax Strategy

The Group

Dun & Bradstreet grows the most valuable relationships in business. By uncovering truth and meaning from data, we connect customers with the prospects, suppliers, clients and partners that matter most, and have since 1841. Nearly ninety percent of the Fortune 500, and companies of every size around the world, rely on our data, insights and analytics.

Dun & Bradstreet has operated in the UK for 100 years and it is the world’s leading source of commercial data, analytics and insight on businesses. Our global commercial database as of September 30, 2019 contained approximately 343 million business records. We transform commercial data into valuable insight which is the foundation of our global solutions that customers rely on to make critical business decisions.

Scope

In accordance with paragraphs 19 of Schedule 19 to the Finance Act 2016, this strategy applies to all the UK domiciled subsidiaries of The Dun & Bradstreet Corporation. A list of the entities to which it applies is set out below and references to ‘the UK Group’ refer collectively to all these entities.

The strategy is being published in accordance with paragraph 16(4) of the Schedule.

This strategy applies from the date of publication until it is superseded. References to ‘UK Taxation’ are to the taxes and duties set out in paragraph 15(1) of the Schedule which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Land Tax. References to ‘tax’, ‘taxes’ or ‘taxation’ are to UK taxation and to all corresponding worldwide taxes and similar duties in respect of which the UK Group has legal responsibilities.

Aim

The UK Group is committed to full compliance with all statutory obligations and full disclosure to relevant tax authorities. The UK Group’s tax affairs are managed in a way which takes into account The Dun & Bradstreet Corporation’s wider corporate reputation and is in line with The Dun & Bradstreet Corporation’s overall high standards of governance.

Governance in relation to UK taxation

- Ultimate responsibility for the UK Group’s tax strategy and compliance rests with the UK Board. The UK Board refers collectively to the Board of Directors of each of the entities listed below.
- The Group Audit & Risk Committee’s requirement to monitor the integrity of The Dun & Bradstreet Corporation’s financial reporting system, internal controls and risk management framework, expressly includes those elements relating to taxation;
- The UK Board has appointed an Executive Director to take responsibility for tax matters;
- Day-to-day management of the UK Group’s tax affairs is delegated to the Finance Controller, and to the UK & Ireland Tax Manager who reports to the Executive Director responsible for tax matters;
- The UK Group tax team is staffed with appropriately qualified individuals;
- The UK Board ensures that the UK Group’s tax strategy is one of the factors considered in all major investments and significant business decisions taken;
- The Executive Director responsible for tax matters reports to the UK Board on the UK Group’s tax affairs and risks during the year.

**Risk Management**

- The UK Group operates a system of tax risk assessment and controls as a component of the overall internal control framework applicable to the UK Group’s financial reporting system;
- The UK Group seeks to maintain a low level of tax risk arising from its operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations;
- Processes relating to different taxes are allocated to appropriate process owners, who carry out a review of activities and processes to identify key risks and mitigating controls in place. These key risks are monitored for business and legislative changes which may impact them and changes to processes or controls are made when required;
- Appropriate training is carried out for staff outside the tax team who manage or process matters which have tax implications;
- Advice is sought from external advisers where appropriate.

**Attitude towards tax planning and level of risk**

The UK Group manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax.

When entering into commercial transactions, the UK Group utilises available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation.

The level of risk which the UK Group accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the UK Group’s tax affairs. At all times the UK Group seeks to comply fully with its regulatory and other obligations and to act in a way which upholds its reputation as a responsible corporate citizen. In relation to any specific issue or transaction, the UK Board is ultimately responsible for identifying the risks, including tax risks, which need to be addressed and for determining what actions should be taken to manage those risks, having regard to the materiality of the amounts and obligations in question.

**Relationship with HMRC**

The UK Group seeks to have a transparent and constructive relationship with HMRC through regular meetings and communication in respect of developments in the UK Group’s business, current, future and retrospective tax risks, and interpretation of the law in relation to all relevant taxes.

The UK Group ensures that HMRC is kept aware of significant transactions and changes in the business and seeks to discuss any tax issues arising at an early stage. When submitting tax computations and returns to HMRC, The UK Group discloses all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain.

Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.
List of entities covered by this Tax Strategy

D&B Group Holdings (UK)
D&B Europe Limited
Dun & Bradstreet Limited
Dun & Bradstreet Finance Limited
D&B Group Limited
Kosmos Business Information Limited
Dun & Bradstreet Investment Limited
D&B Holdings Australia Limited
D&B Holdings (UK)
Avention UK Limited
Onesource Information Services UK Limited

Adopted by the UK Board of Directors on 7 November 2019