



Elavon Financial Services

UK Tax Strategy Statement For
Publication

Introduction

This Statement summarises the arrangements and approach under which the U.S. Bancorp Group (“U.S. Bank Group” or “the Group”) addresses the management of tax in our UK businesses. This document has been drafted to ensure that it is in accordance with the requirements of the UK Finance Act 2016 to have a tax strategy publicly available. We regard this statement as complying with our publication duty under Schedule 19 of the Act.

The U.S. Bank Group, based in Minneapolis, operates the 5th largest commercial bank in the United States and maintains operations in a number of countries worldwide. In the UK, the Group maintains 3 principal business units, carrying on payment services, corporate trust services and fund administration services respectively. These business units are operated through six entities in the UK¹.

During 2020, Elavon acquired Sage Pay (now Elavon Digital, trading as Opayo), a well-known and established payments gateway business in the U.K and Ireland. This acquisition is part of the Group’s strategy to help its business customers grow as the global economy becomes more digital. This acquisition saw Elavon expand their market share in the payment services business in the U.K and Ireland.

The Group places a high value on carrying on all aspects of its business with high ethical standards, going beyond any legal minimum, and regards its reputation as fundamental to its success.

Approach to tax governance and risk management

The Group company carrying on the vast majority of the Group’s business activity in the U.K. is Elavon Financial Services DAC (“EFS”). EFS is an Irish headquartered bank carrying on business across Europe through a number of branches, including a U.K. branch.

¹ These entities are Elavon Financial Services DAC (UK Branch), US Bank Trustees Ltd, US Bank Nominees Ltd, US Bank Global Corporate Trust Limited, Elavon Digital Europe Limited and Elavon Digital GB Limited

EFS adopted HM Revenue & Customs (HMRC's) Code of Practice on Taxation for Banks in 2013 and has complied fully with its requirements. The Code requires banks operating in the UK to adopt best practices in tax management and not to promote or knowingly facilitate tax avoidance by other parties, including that banks should:

- adopt adequate governance to control the types of transactions they enter into
- not undertake tax planning that aims to achieve a tax result that is contrary to the intentions of Parliament
- comply fully with all their tax obligations; and
- maintain a transparent relationship with HMRC.

As a result of the nature of the three business activities carried on in the UK, there are a broad range of UK tax payment and reporting obligations., The primary obligations for the UK entities fall under corporation tax, PAYE/NIC and VAT legislation.

Ultimate responsibility for compliance with UK tax law rests with the directors of the Group companies carrying on operations in the UK. Day-to-day responsibility for compliance is devolved to management through the companies' Chief Executive Officers. As a general principle, line management who exercise control over a particular activity are responsible for ensuring that all legal and regulatory obligations arising from that activity are identified and fulfilled, with support from specialist expertise where required.

The Group's approach is to apply appropriate levels of control and governance to UK tax matters, consistent with the approach it adopts to other matters involving compliance with the law and efficient financial and risk management. The Group seeks to ensure that management is enabled to fulfill all UK tax obligations and that tax management is subject to appropriate governance by maintaining a robust tax management framework, including:

- maintenance of appropriate levels of internal tax expertise and ongoing engagement of external UK tax advisers to identify, understand and fulfill all tax obligations;
- application of the Group's broader control framework to tax matters;
- direct reporting line of the Head of Tax to the Chief Financial Officer, together with a secondary reporting line to the US Bank Group Director of Tax;

- ensuring that all material judgements on tax matters are taken by appropriate persons and are recorded fully to ensure consistent application.

Attitude to tax planning and tax risk appetite

The Group seeks to comply fully with all UK tax law while also refraining from engaging in any contrived or artificial tax planning arrangements with negligible business purpose.

In the course of managing tax risks, the Group continually takes account of the importance of the reputation of our business with our customers (current and future), counterparties, employees, regulators and other stakeholders.

Where any material element of UK tax law is identified as involving any significant degree of uncertainty the Group's approach is generally to obtain external advice to inform the Group's position.

Approach to dealings with HMRC

In accordance with the Code of Practice on Taxation for Banks, the Group maintains a transparent relationship with HMRC. Across various interactions, EFS Tax Department's approach to dealing with HMRC is to be responsive, interactive, constructive and engaging. To the extent that an occasional difference of opinion might arise, EFS Tax's approach would be to seek to resolve it with HMRC through constructive discussion of the relative merits of the arguments in favour of each side's position.

When the opportunity arises, we seek to update HMRC on relevant changes in the business and discuss tax issues of current relevance to the Group.

Overall, we see the maintenance of such a relationship with HMRC as an integral and important element of our approach to achieving high standards of compliance with UK tax law and sound management of all UK tax risk inherent in our businesses.

Elavon Financial Services DAC

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United Kingdom branch registered in England and Wales under the number BR009373.

Elavon Financial Services DAC, trading as Elavon Merchant Services, is authorised by Central Bank of Ireland and the Prudential Regulation Authority and subject to limited regulation by the Financial Conduct Authority and Prudential Regulation Authority. Details about the extent of our authorisation and regulation by the Prudential Regulation Authority, and regulation by the Financial Conduct Authority are available from us on request