



Aspinalls Club Limited Tax Strategy

Financial year ending 30 June 2019

This document sets out the Tax Strategy of Aspinalls Club Limited and Crown UK Investments Limited (together 'Crown London Aspinalls') for the financial year ending 30 June 2019 and has been approved by the Board of Directors for each of these entities.

Crown London Aspinalls is one of the licensed high-end casinos in London's prime West End entertainment district and is part of a global group headquartered in Australia. Located in the heart of Mayfair, Crown London Aspinalls offers members and guests an exciting and opulent world of international VIP gaming.

Crown London Aspinalls makes a significant contribution to UK tax revenue, paying corporation tax, gaming duty and VAT. Crown London Aspinalls is committed to complying with UK tax legislation and to maintaining high standards of conduct. Crown London Aspinalls operates in a highly regulated industry and accordingly has set up processes and procedures to manage risks, including tax risks.

Our approach to risk management and governance

The Crown London Aspinalls' directors oversee and are ultimately responsible for the tax strategy and associated risk management policies and procedures. The General Manager – Finance has day to day responsibility for tax and has direct access to the directors in relation to the management of tax and finance matters.

In managing tax matters on behalf of Crown London Aspinalls', the General Manager – Finance liaises with internal tax specialists in the first instance and, depending upon the significance of the matter, will seek independent advice from appropriately qualified local third party advisors.

Our approach to managing tax risk

Crown London Aspinalls has a low tolerance level to tax risk. Tax risks are identified, mitigated and monitored by a system of procedures and controls implemented to ensure proper review and escalation of material issues. Where there is a significant residual risk relating to the tax treatment of a transaction or uncertainty as to a judgement in relation to tax, third party advice will be sought to ensure that Crown London Aspinalls remains in line with its objective of commitment to tax compliance.

To the extent a significant issue does arise, it is expected to be brought to the attention of the directors on a real time basis.

Our approach to tax planning

Crown London Aspinalls balances considered commercial planning (which would include consideration of tax matters) with appropriate tax risk management (set out above) by adopting valid and supportable positions and maintaining awareness of other prevailing views and risks.

Our approach to engaging with HM Revenue & Customs ('HMRC')

Crown London Aspinalls engages with HMRC in an honest, open and transparent manner and takes a collaborative and timely approach when responding to HMRC enquiries. Tax filings have always been lodged by the due date.

Crown London Aspinalls participates in government led consultations on amendments to existing legislation that impact its tax obligations.