Background

Qatari Diar Real Estate Investment Company ("QDREIC") has a board approved tax strategy that governs its approach to tax. This UK tax policy is a subset of the QDREIC Group (QDREIC and all subsidiary entities collectively referred to as "the Group") tax policy and reflects the Group's objectives with regards to UK tax.

QDREIC annually reviews its tax strategy to ensure alignment with its overall business strategy. QDREIC is committed to being a responsible taxpayer, acting fairly and transparently with tax authorities.

Scope

QDREIC operates through a number of entities in the UK (and also through non UK entities which hold UK assets). These include limited companies, limited partnerships, unit trusts and limited liability partnerships.

This tax strategy applies to each entity that has any UK tax obligation. Tax for the purposes of this strategy are those taxes and duties set out in paragraph 15(1) of Schedule 19 Finance Act 2016. This tax strategy relates to the financial year ended 31 December 2022. QDREIC regards the publishing of this document and making it available on its website as fulfilling the Group's obligations under Schedule 19 Finance Act 2016.

Although joint venture operations in the UK are not covered by this tax strategy, whilst working with joint venture partners, QDREIC applies, to the extent possible, the same principles in its approach to those business operations that it would to a wholly owned business operation.

The Group intends to review this tax strategy annually.

The Group's Tax Objectives for the UK

The objectives of the QDREIC UK tax strategy are to:

- Ensure that the Group is compliant with all UK filing and tax payment obligations.

- Ensure full disclosure to HMRC of all relevant facts and information.

UK Tax Strategy

The Group's approach to Tax Risk Management

QDREIC has a full suite of documented policies, procedures and reporting requirements for all of its business activities, which include all aspects of tax risk management. In applying the tax risk management policy, tax risks are identified and reported to management regularly. In order to identify, manage and mitigate tax risk:

- The Group employs tax professionals to assist the UK business in its filing and payment obligations and to provide advice to the UK business.
- Where considered necessary external professional tax advice is taken to supplement the in-house capability.
- UK tax risks are collated as part of the overall QDREIC Risk Management Framework on a regular basis that identifies material or significant risk areas.
- UK management will receive a six monthly update on tax risks as part of the risk management framework.
- The Group has a desire for low tax risk.

Where relevant Tax is always considered as part of the commercial business decision making process:

- Commercial business decisions receive tax overview as a matter of course.
- The Group carefully considers the tax impact of all major business decisions.
- No tax planning which results in tax benefits inconsistent with the underlying commercial business substance would be entered into unless there is specific legislation designed to promote that result.
- The Group may undertake tried and tested planning which is common in the market and results in a low level of tax risk relating to a commercial transaction if, after taking relevant professional advice, it is considered appropriate.
- Where relevant external professional advice would be sought depending on the tax risk analysis, taking into account the nature of the tax risk and the commercial profile of the transaction or risk.

In dealings with HMRC, the Group:

- Aims to have a constructive relationship with HMRC, based on regular and proactive communication.
- Aims to engage in open discussion about contentious issues with HMRC.
- Where appropriate will obtain tax clearances from HMRC.
- Will ensure that it is advised by an appropriate professional firm where there is a difference of interpretation between the Group and HMRC on the application of specific legislation prior to any formal appeal proceedings.

Tax administration and payment:

- The Group has low tolerance in tax risk for errors, omissions or late submission of tax filings.
- Tax returns should contain all relevant information necessary for HMRC to be able to consider the transactions reported.
- Tax returns should contain accurate calculations of the tax due.
- Where tax payments are based on estimated or budgeted figures the latest estimate or budget available is used, reflecting the best estimation of current circumstances.
- Should an inadvertent error occur it would be fully disclosed to HMRC in a timely manner.
- QDREIC employs a tax process tracking and filing system to ensure that all reporting requirements are captured and delivered in line with HMRC deadlines.