

UK tax strategy

“Millennium Group” is a global, multi-asset investment management organisation with its headquarters in New York, USA. This tax strategy sets out Millennium Group’s approach to UK tax, relating to the Millennium Group’s UK entity Millennium Capital Management Limited (“Millennium UK”).

Millennium UK regards the publication of this tax strategy as complying with its obligations under section 161 and paragraph 22(2) of Sch. 19 to the Finance Act 2016 in respect of the financial year ended 31 December 2018. It applies to applicable UK taxes.

This tax strategy has been reviewed and approved by the board of directors of Millennium UK.

1. Our approach to UK tax risk management and governance

Millennium UK is committed to achieving compliance with all applicable UK tax laws, including that it pays the appropriate amount of UK tax and tax returns and payments are accurate and made on time.

The Millennium Group’s tax strategy is overseen in the UK by the board of directors of Millennium UK. Through a coordinated effort, which includes contributions from Millennium UK’s various departments, the tax department implements the approach to compliance with the Millennium Group’s tax obligations with oversight from the global management team.

The day-to-day management and implementation of the UK-specific tax strategy is delegated to and coordinated by the international tax manager based in the UK, with assistance from respective personnel located in the UK and the US. The UK-based international tax manager is responsible for all UK tax compliance, planning and reporting. The UK-based international tax manager reports regularly on tax matters to the CEO of Europe, the Global Chief Financial Officer and the Global Head of Tax.

In line with the Millennium Group’s tax strategy, the tax department of Millennium UK collaborates with the wider business groups to identify, assess, monitor and manage tax risks within the business.

2. Our attitude towards UK tax planning & our acceptance of UK tax risk

Millennium UK considers and takes account of the tax consequences in connection with commercial transactions. Whilst tax efficiency is taken into account in structuring transactions, transactions are led by commercial rather than tax planning motives and use of structures that are artificial or lack commercial substance is avoided. Millennium UK does not use aggressive or marketed tax avoidance arrangements or schemes. Decisions regarding tax planning are evaluated and overseen as described in section 1 above, taking into account commercial, operational and reputational factors, including the wider impact tax risk might have on our relationship with HMRC and stakeholders (including employees and investors in the funds the Millennium Group manages).

Millennium UK may take advantage of available tax reliefs or well established and accepted structures or arrangements where this is provided for by the law and is aligned to our approach to tax planning and tax risk appetite.

To the extent possible, Millennium UK aims for certainty on tax positions it adopts. External, tax advice is often sought where the tax treatment of transactions under tax law is complex, unclear or uncertain. Millennium UK also frequently engages external tax advisors for tax compliance and advisory assistance, as an additional safeguard to ensure tax compliance and reduce tax risks.

3. Our approach towards working with HMRC

Millennium UK’s practice is to maintain an open, transparent and constructive relationship with HMRC. Additionally, Millennium UK endeavours to respond to all queries raised by HMRC with honesty and integrity and in a comprehensive and timely manner.

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