

Andrew Bonfield
Chairman: The Hundred Group Tax
Committee
c/o National Grid Plc
1-3 The Strand
London
WC2N 5EH
Direct dial: 0207 004 3033



The Hundred Group
of Finance Directors

Tax Committee

By email: philippa.staples@hmrc.gsi.gov.uk

Mr David Easton
HM Revenue and Customs
CTIAA AAG
3C/18
100 Parliament Street
LONDON SW1A 2BQ

15 October 2012

Dear Mr Easton

Consultation on lifting the lid on tax avoidance schemes

We welcome the opportunity to contribute to the proposals to continue the Government's strategy on tackling tax avoidance.

Who we are

The Hundred Group represents the views of the finance directors of FTSE 100 and several large UK private companies. Our member companies represent almost 90% of the market capitalisation of the FTSE 100, collectively employing over 7% of the UK workforce and in 2011, paid, or generated, taxes equivalent to 13% of total UK Government receipts. Our overall aim is to promote the competitiveness of the UK for UK businesses, particularly in the areas of tax, reporting, pensions, regulation, capital markets and corporate governance.

Our views

We agree with the Government's stance on unacceptable tax avoidance and support the steps being taken, including the introduction of a general anti-abuse rule (to which we submitted a detailed response on 14 September 2012).

We also agree that there should be a better public awareness of tax avoidance arrangements and their risks and believe there could be a case for revisions to the disclosure of tax avoidance schemes (DOTAS) hallmarks.

We have not chosen to respond to the specific questions raised in the consultation paper, however we reiterate our strong support for a reduction in tax avoidance. We believe it is in all our interests to ensure that all taxpayers are paying what is due and not using artificial schemes to avoid their liabilities.

Yours sincerely



Andrew Bonfield
Chairman
The Hundred Group Tax Committee