



The Hundred Group
of Finance Directors

Andrew Bonfield
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Tax Committee

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Mr Andrew Ellis
HM Revenue and Customs
Savings and Share Schemes Team
Room G53
100 Parliament Street
LONDON SW1A 2BQ

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Dear Mr Ellis

Consultation on the Office of Tax Simplification's report on tax advantaged employee share schemes

We welcome the opportunity to contribute to the proposals to simplify the current tax advantaged employee share scheme regime and are wholly supportive of the Government's drive to clarify and simplify tax legislation in order to maximise efficiency and certainty for both the taxpayer and HMRC.

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 Office of Tax Simplification "OTS" recommendation that certain elements of operating these schemes are overly prescriptive and further simplification thereof should be introduced where possible. This is likely to provide significant cost benefits to taxpayers relating to the administration and compliance of schemes.

We support the need to further review the relevance of CSOP schemes, noting as the OTS did, that the overall purpose of such schemes now seems vague, as the £30,000 limit does not seem targeted at either senior executives or the majority of employees.

We have not chosen to respond to the specific questions raised in the consultation paper, however we reiterate our strong support for simplification of the current tax regime. We believe it is in all our interests to ensure that the reforms of taxes continue to give businesses confidence in the tax regime of the United Kingdom and to allow a competitive environment for them to operate in.

Yours sincerely



Andrew Bonfield
Chairman

The Hundred Group Tax Committee