**Oil and Gas**

BG Group – 62 tax haven based subsidiaries out of 300 total – 20.67% (Guardian). Paid 13% corporation tax on its global profits in the UK in 2011 – good compared to BP, Shell and Tullow, who paid around 3%. (‘Making a Killing’, Platform, Feb 2013).

BP – The church have 3,625,000 holdings in BP with a market value of £17,850,000, making them one of our largest investments. 34.25% of BP’s subsidiaries are based in tax havens, 537 out of 1568 (according to the Guardian - 605/1596, 37.90% according to Platform). BPs profits increased threefold between 2001-2011, from $13.1bn to $39.8bn. However, their tax paid only grew from £707m to £730m – it should have been £2.1bn if it had grown at the same rate as profits. BP only paid a corporate tax rate of 2.99% on their global profits in 2011. Osborne has given oil and gas companies a number of lucrative tax breaks for their North Sea operations and, recently, fracking. BP prefers to place its shell companies for tax avoidance purposes in Delaware, Bermuda, Luxembourg and the BVI. BP Pipelines Vietnam, BP Trinidad Exploration, Baku-Tbilisi-Ceyhan Pipeline Holding, Amoco Venezuela Energy Company, BP Egypt West Mediterranean (Block B), BP Angola (Block 18) and Korea Energy Investment Holdings are all based in the Netherlands (Platform, 2013). In 2009, BP were fined $275m for tax evasion in Turkey, avoiding around £60m worth in taxes (Financial Times, 05/03/2009).

Chevron – illegally evaded $3.25bn in US taxes between in 1970-2000 through a petroleum transfer pricing scheme in Indonesia (Johnston, D.C. 2003). Accused of tax avoidance by the Nigerian government in 2006 - claim made that they had evaded paying $2.7bn in tax, and were therefore subject to penalty fines of $8.1bn. Chevron denied the allegations (nm.onlinenigeria.com, 2005). This has since developed into a complex legal battle after the director of ABZ Integrated Limited, the tax consultants who originally made the allegations, accused the head of the Nigerian Inland Revenue of diverting $131m from Chevron's $491 tax repayments, and refusing to pay ABZ for their services. The Inland Revenue have denounced this as an attempt at blackmail. Senator Bernie Sanders named Chevron one of the top ten tax avoiders in the US, having made $10bn, but received a $19m refund from the IRS! (www.sander.senate.gov, 2011)

Shell – Has 18 subsidiaries in Nigeria. Nigeria offers tax incentives for drilling and exploration – the more land holdings a company has, the less tax they have to pay. In late 2012, Shell’s offshore oil rig *Kulluk* ran aground on the shores of Sitkalidak Island, Alaska. It was later revealed that this was in order to leave state boundaries in order to avoid $6m in tax liability (greenpeaceblogs.org, 2013). The name ‘Royal Dutch Shell’ is indicative of the merger between the UK and Holland branches of the company in 2005, which led to their relocation to the tax-friendly Netherlands. Furthermore, legal ownership of Shell’s trademarks, including their famous logo, is now based in the infamous low-tax Swiss canton of Zug. In 2011, they only paid $1.27bn in tax to the UK, compared to their $55.6bn profits – 2.28%. Shell has 85 subsidiaries in six 0% tax zones (Platform, 2013). Starbucks is a novice at tax dodging compared to Shell, who have been playing the game since 1914, before the current structures of global finance even existed!

Tullow Oil – Paid an effective UK tax rate of 3.39% on their profits of $1.1bn. Tullow has also encouraged a ‘race to the bottom’ between Kenya and Uganda on tax breaks, and resorted to international arbitration by the infamously biased World Bank International Centre for Investment Disputes, rather than paying VAT on machinery it is importing into Uganda (Action Aid, 2012). Tullow only have 75 subsidiaries – but 44 are in tax havens (58.67%)!

Wood Group (John) – The Chairman of John Wood plc moved the registration of all of their employees to Guernsey, and a shell company called Wood Group Offshore Services Limited, saving £15m a year in tax (Aberdeen Press & Journal/RMC Oilc, 2011).

**Chemicals**

Johnson Matthey – 27 of JM’s 107 subsidiaries are based in tax havens – 25.23%. (Action Aid, 2011)

**Mining**

Anglo American – 122 of 833 subsidiaries in tax havens – 14.65%. (Action Aid, 2011) Below average! Anglo-American makes £2.8bn in Africa and South America alone, and while there is no direct evidence for their tax evading, 26 of these tax haven based subsidiaries are named for the developing countries they are presumably linked to, and therefore being used to siphon money out of, e.g. ‘Anglo African Holdings ltd’ in the British Virgin Islands and ‘Anglo South America Investments Sarl’ in Luxembourg (Action Aid, 2012).

BHP Billiton – 139/452 subsidiaries in tax havens, 30.75%. 51 are in Delaware (Action Aid, 2011). BHP Billiton are infamous for their many environmental abuses, particularly in South America and Australia. The government of Australia has recently released plans to force large companies to reveal their full accounts to prevent tax dodging – BHP Billiton and Rio Tinto were mentioned specifically (taxresearch.org.uk, Apr 2013). The Mozal Aluminium Smelter in Mozambique was a development project funded by many foreign governments and private investors – however, these governments and investors have made more profit through interest payments on the loans given to fund the project than the Mozambique government. BHP were the primary private investor – their annual average profits of $114m are seven times higher than the Mozambique government (JDC, Jan 2013). However, there are also some rare positives: “A paper published in a volume by World Economy, Ecology and Development (WEED) examined why most private mining companies operating in Chile do not publish financial results or pay taxes. It focused on one company that is regarded as more responsible, because of the fact that it publishes its financial results, pays some tax, and voluntarily supports a variety of social projects. That company is Minera Escondida, the world's largest private copper-mining operation, owned by BHP Billiton.” (Knowmore.org). Furthermore - BHP Billiton funded a 2006 report by the World Bank and International Bank for Reconstruction & Development entitled “Mining Royalties: A Global Study of Their Impact on Investors, Government, and Civil Society” (Otto et al/World Bank 2006).

Randgold Resources – Randgold only have 38 subsidiaries, but 20 of them are in tax havens (Action Aid 2011). Action Aid (2012) say – ‘Thirteen out of 19 tax haven companies owned by mining company Randgold Resources carry African place names. This includes five subsidiaries in Jersey and the Netherlands carrying the name of the Kibali gold mine in the Democratic republic of Congo (DRC). By contrast, Randgold lists just one subsidiary registered in the DRC itself. Randgold told ActionAid that “all of our operations are located in Africa, within which we are a significant tax payer”, and that “our corporate structure is effective and appropriate for our business, and allows us to invest the maximum amount of our capital in developing operations”’

Rio Tinto – 143/799 (17.9%, below average). Was involved in Mongolia’s recent decision to become one of the first developing countries to back out of their double-taxation treaties with the Netherlands, UAE, Kuwait and Luxembourg. Turqoise Hill, in whom Rio Tinto own a 51% stake, run the highly lucrative Oyu Tolgoi mine in the Gobi Desert, which Rio Tinto believe will become the third largest copper mine in the world. The dual taxation agreement allowed Dutch-registered firms to channel income from dividends, royalties and interest earned in Mongolia through their Dutch company, so pay no withholding tax. Other Dutch treaties with states that charge little or no tax, such as Bermuda, let companies move that money on from the Netherlands to tax havens. Terminating the treaty means firms that use countries like the Netherlands to channel tax-free earnings from Mongolia could lose the tax benefits, or be forced to seek a different low-tax route. However, a Rio Tinto spokesman told Reuters in an email that the cancellation of the Dutch treaty will not affect Oyu Tolgoi's use of its Dutch holding company, because the firm has a separate investment agreement with Mongolia which "stabilizes" treaties that were in force in 2009. Rio Tinto said it has and will continue to pay all taxes due under Mongolian law (Reuters, July 2013).

Glencore-Xstrata - Owners of the Mopani Copper Mine, the case of which has been covered by Action Aid (2011), among others.

**Construction and Materials**

CRH – The Irish construction giant made headlines in the mid-90s when it was discovered that their former chairman was running an illegal offshore bank from the company’s head office, facilitating tax avoidance for a ‘golden circle’ of wealthy board members (Independent.ie, 2000).

**Engineering**

Smiths Group – 53/261 tax haven based subsidiaries (20.31%) (Action Aid, 2011). In March 2013, The Mail on Sunday revealed that despite profits of £365m, Smiths Group had paid precisely £0 in UK tax, making them one of their ‘Dirty Dozen’ tax dodgers.

**Electronics**

IMI – 45/268 haven based subsidiaries (16.79%) (Action Aid, 2011). In the same report as above (MoS, March 2013), TMoS revealed IMI as another of their ‘Dirty Dozen’, having received a £1.6m tax *credit* on their £301m profits. They claimed this was because of a ‘major contribution it had paid into its pension scheme.’ IMI’s finance director Douglas Hurt spoke out against David Cameron’s tax dodging crackdown, saying he feared innocent firms would be punished because of the “alleged abuses by a few” (Express, January 2013).

The Weir Group – 25/194 haven based subsidiaries (12.89%) (Action Aid, 2011). Lord Robertson, the former defence secretary and Nato secretary general, is a non-executive director of The Weir Group, which has subsidiaries in the Bahamas and the British Virgin Islands. Robertson said that Weir's offshore subsidiaries are “not used”. “In the annual report you will see that Weir Group pays more in tax than British taxation demands” (Guardian, September 2012).

**Support Services**

Aggreko – 15/56 haven based subsidiaries (26.79%) (Action Aid, 2011). In response to Action Aid’s survey of the FTSE 100 and the resulting Guardian article, Aggreko gave a full breakdown of the purpose of each of their subsidiaries and where they pay tax – a good start and commendable in terms of transparency (Action Aid, 2013). However, further clarification would be required if we were to ascertain the true purpose of Aggreko Euro Holdings BV, Aggreko American Holdings BV and Aggreko Rest of the World Holdings BV- all based in the Netherlands, land of double-taxation treaties and other such laws that make it the perfect place for holding companies.

Capita – Used by the government for the outsourcing of public services, Capita have offshore subsidiaries in Ireland, Guernsey and Jersey. Ironically, the DVLA recently awarded them a £100m contract to crack down on vehicle tax and insurance evasion (Independent, March 2012).

Experian – 10/20 tax haven subsidiaries (Action Aid, 2011). Experian’s data is used by HMRC to sniff out tax fraudsters using the benefit credit system – the irony being that they are also in the Daily Mail’s ‘Dirty Dozen’ (March 2013), having made profits of £454m in 2011/12, but received a whopping £159m tax *credit*, claiming that this was due to losses made the previous year which they were permitted to offset against UK profits. Their headquarters are in Dublin.

Hays – Has holding companies in Malaysia, the Netherlands and Hong Kong, as well as active subsidiaries in Hong Kong, Ireland, the Netherlands, Belgium, Singapore, Switzerland and the UAE (Hays Annual Report, 2013).

Intertek Group – 35/203 tax haven subsidiaries, 17.24% (Action Aid, 2011). In 2011/2012, Intertek paid no UK tax on profits of £213m, putting them in the Mail’s Dirty Dozen (March 2013).

Regus – Regus plc is registered in St Helier, Jersey, and has its headquarters in Luxembourg City, Luxembourg. They also have a holding company in the British Virgin Islands, three in Luxembourg, two in Mauritius (holding companies for their operations in India and Pakistan), two in the Netherlands and one in Switzerland. The Regus Global Management Centre is also in Switzerland (Annual Report, 2012).

Wolseley – 17/41 tax haven subsidiaries (41.46%) (Action Aid, 2011). Headquartered in Zug, Switzerland, and registered in St Helier, Jersey (Wolseley.com, 2013). The move to Switzerland saved them £23m in the year ending July 2010 – however, the Financial Times (Sep 2010) gave the move its blessing, saying that they would still pay taxes on their UK operations, and that 90% of their revenue came from outside the UK anyway.

**Food Producers**

Associated British Foods – Now a well known case, thanks to ActionAid’s research into their dealings in Zambia and other southern African countries. 71/453 tax haven subsidiaries (15.67%) in 2011, now reduced to 65 - 12 in Delaware, 13 in the Netherlands, 15 in Ireland, 6 in Jersey, 7 in Luxembourg, 6 in Mauritius and 1 each in Liberia, Guernsey, Singapore, British Virgin Islands, Switzerland and Hong Kong. In Zambia, despite profits of $123m in the country since 2007, they’ve paid virtually no corporation tax, cheating Zambia of $27m. Since 2007; $47.6m has been paid by Zambia Sugar to an Irish subsidiary for ‘management fees’, despite that company having no employees; a $70m loan has been routed through Ireland, avoiding $3m in interest fees for Zambia; the ownership of Zambia Sugar has switched between Ireland, the Netherlands and Mauritius, reducing the Zambian tax bill by $7.4m; and by taking the Zambian government to court, ABF have managed to reduce their tax rate to just 10%, saving a further $9.3m (Action Aid, 'Sweet Nothings', 2013).

Unilever (UK)- Action Aid’s tax haven tracker revealed that Unilever had 696 subsidiaries of which 181 (26.01%) were in tax havens and 34% in developing countries (Action Aid, 2011). A more recent Guardian estimate has this number at 170 tax havens, of which a stunning 76 are in the Netherlands, and 30 each are in Delaware and Luxembourg. A further 15 are in Switzerland, 4 in Bermuda, 3 in Singapore, 2 in Hong Kong, Cyprus, Latvia and Costa Rica, and 1 each in Bahrain, Lebanon and the Netherlands Antilles. Unilever’s own website claims that ‘Secrecy jurisdictions or so-called ‘tax havens’ are not used for tax avoidance.’ Furthermore, they claim that ‘We are transparent about our approach to tax. We regularly put forward understandable, timely and transparent communication about our tax policy and total tax payments. We aim to pay an appropriate amount of tax according to where value is created within the normal course of commercial activity. Any transfer pricing is always calculated using the ‘arm’s-length’ principle.’ Unilever were one of the four FTSE 100 companies chosen by Christian Aid to assist them in their campaign for greater transparency.

**Household Goods and Home Construction**

Berkeley Group – Wholly UK based, where they have paid £61m in tax. If they were fully taxed at 24% with no deductions, they would pay £77.7m. Around £10m was deducted for deferred taxes from 2012 (26%) at the new, lower rate of 24% - however, another £7m went missing from their tax bill classified as ‘adjustments in respect of previous years.’ A footnote defines these as ‘items such as contaminated land relief, research and development relief and other timing differences that are not individually significant and have not therefore been separately disclosed. *The other adjustment predominantly relates to the deferred tax effect of transferring the ownership of certain properties during the year to subsidiaries incorporated in overseas tax jurisdictions with different rates to the UK*.’ At least they’re honest! All their subsidiaries are registered and operate in England and Wales, although there is one subsidiary based in the Isle of Man and three in Jersey, including two simply named ‘BRP Investments No. 1 Limited’ and ‘BRP Investments No. 2 Limited’ – might these be the ‘certain properties’ named above? No – they’ve been registered in Jersey since 2010. (All info from Annual Report 2013).

Reckitt Benckiser Group – 63/211 tax haven subsidiaries in 2011 (29.86%) (Action Aid, 2011). This has risen to an astonishing 85 in 2013, according to the Guardian (2013). 17 in Netherlands, 13 in Luxembourg, 11 in Ireland, 10 each in Delaware and Jersey, 5 in BVI, 4 each in Switzerland and Guernsey, 3 each in Hong Kong and Singapore, and 1 each in the Cayman Islands, Bermuda, Cyprus, Costa Rica and Latvia. ActionAid (October 2011) named it one of the top ten users of Luxembourg as a tax haven.

**Clothing**

Burberry Group – 25/93 subsidiaries are in tax havens (Action Aid, 2011) – this went down to 20 in 2013. 7 of these are in Luxembourg, 4 in Delaware, 3 in Hong Kong, 2 each in Ireland and Jersey and 1 each in the Netherlands and Macau. The CEO of Burberry was one of a coalition of business leaders who lobbied David Cameron to stop moralising on tax avoidance and let them get on with it for the greater good of the economy – along with those of Vodafone and Tesco. (Guardian, May 2013).

**Healthcare Equipment and Services**

Smith & Nephew - 38/160 (23.75%) tax haven subsidiaries (Action Aid, 2011). This total has gone down fairly considerably in the 2013 figures, to 28. 11 of these are in Delaware, 6 in the Netherlands, 5 in Switzerland, 2 in Hong Kong and 1 each in Ireland, Luxembourg, Singapore and the Caymans. Smith and Nephew were one of only four companies who entirely failed to respond to ActionAid’s request to supply a list of their tax haven subsidiaries in 2011 – even though this is technically illegal and all subsidiary locations must be revealed to Company House under the Companies Act 2006.

**Pharmacology and Biotech**

Astrazeneca – 51/255 (25%) tax haven subsidiaries in 2011 (Action Aid). The 2013 figures from the Guardian say 47, of which 23 are in Delaware and 13 are in the Netherlands, 2 in Hong Kong and 1 each in Ireland, Luxembourg, Singapore, the Caymans, Switzerland, Panama, Costa Rica, Latvia and Jordan. Another, in Puerto Rico, was used to register the rights to several of their best-selling drugs in the late 90s and early 2000s. In 2004, they only paid the UK government £103m out of their £2.6bn profits. Since then, they have continually been embroiled in ongoing disputes with both the UK and US over unpaid taxes, as well as illegal transfer pricing. The US arm of AstraZeneca was involved in a large scale, abusive tax-avoidance scheme run by KPMG, which successfully fleeced the US of $1bn but was shut down by the IRS in 2004. It has put aside $1.3bn dollars to settle ongoing tax audits worldwide. (Guardian, Feb 2009) In 2010, they paid the UK £505m to settle a transfer pricing arrangement, but in 2011, they reached an agreement with the UK and US whereby they received a refund from the UK in order to pay the US $1.1bn – substantially less than they had budgeted for, and saving them $500m and raising their profit target by 7% (Guardian, March 2011).

Glaxosmithkline – With 1,209,000 shares valued at £16,769,000, the pharma giant is one of the Methodist Church’s biggest investments. 84/420 (20%) tax haven subsidiaries in 2011 (Action Aid), *rising* to 91 in 2013 – 31 of these are in Delaware, 11 in the Netherlands, 10 in Ireland, 7 in Singapore, 4 in Jersey and Switzerland, 3 in Hong Kong, Luxembourg, Bermuda and Costa Rica, 2 in Mauritius and Panama, and 1 each in the Caymans, BVI, Guernsey, Cyprus, Malta, the Antilles, Latvia and Liberia (Action Aid). BBC’s Panorama revealed that GSK had set up a subsidiary in Luxembourg, which then paid a loan of £6.34bn to another UK subsidiary, which then paid £124m back in interest to Luxembourg, removing these costs from their UK tax bill – around £34m (BBC, May 2012). However, the CEO of GSC launched a stinging attack on companies moving their headquarters abroad for tax purposes, declaring that it is "completely wrong" for businesses to view themselves as "mid-Atlantic floating entities" with no connection to society (Guardian, March 2011). Their headquarters are still in Brentford, UK.

Shire – Registered in Jersey (a holding company), with corporate HQ in Ireland –this makes royalties made on patents filed in Ireland absolutely tax free (Irish Examiner, May 2008). 48/102 tax haven subsidiaries – 47.06% (Action Aid, 2011). This has *risen* to 54 in 2013: 18 in Delaware, 14 in Ireland, 5 in Luxembourg, 4 in Malta, 3 in Netherlands, 2 each in Jersey, the Cayman Islands and Barbados, and 1 each in Singapore, Switzerland, British Virgin Islands and Bermuda (Action Aid).

**Food and Drug Retailers**

Greggs – Greggs are entirely UK based and pay all of their taxes. A positive example, if only because they are not multinational (yet...)

Morrisons (WM) Supermarkets – With only 10 subsidiaries in tax havens (out of a total of 85) as of 2013 (Action Aid), Morrisons aren’t doing that badly. 3 in Jersey and Gibraltar, one each in the Netherlands, Hong Kong, Guernsey and the Isle of Man. Morrisons only score a meagre 5/15 on the Fair Tax Mark Website, but this is still substantially better than Tesco and Sainsburys, and relates mostly to their lack of country-by-country reporting (fairtaxmark.net, 2013). As we’ve ascertained that they only have 2 tax haven subsidiaries outside the UK anyway, this isn’t that shocking. Last year, Morrisons paid over 25% of their profits in corporation tax to the UK, and their Finance Director, Richard Pennycook, is on record as saying that there should be a ‘level playing field’ for companies operating in the UK, further stating that ‘taxes on activity here in the UK should stay here. Transparency is very important' (Sky News, October 2012). While he was undoubtedly making a pointed remark criticising his rivals at Lidl, we’ll take positives where we find them.

Sainsburys – Sainsburys score a measly 2/15 on the fair tax mark, the joint lowest score currently awarded. This is down to their refusal to use country-by-country despite operating in 8 countries, and, weighted over 6 years, their paying 7% under the UK corporation tax rate on their profits - it is impossible to assess whether this has been paid on appropriate UK profits. This left a gap of £458m between what it should have paid and what it did pay between 2007-2012. It has only disclosed the locations of some of their tax haven subsidiaries (fairtaxmark.net, 2013). In 2011, 14/89 subsidiaries were in tax havens (15.73%) (Action Aid), but this went up to 15 in 2013. 4 in Ireland, 3 in the Cayman Islands, 2 each in Delaware, Jersey and Hong Kong, and 1 each in Guernsey and the Isle of Man (Action Aid, 2013). CEO Justin King is a frequent and outspoken critic of tax avoidance (Channel 4 News, Jan 2013/The Times, Nov 2013), but his attempts to stay in the good books of his target market were scuppered when it was revealed that Sainsburys were not 100% UK domestic, as he claimed (fairtaxmark.net, 2013/taxresearch.org.uk, Nov 2013), and that they had made a deal with notorious tax dodgers Vodafone to provide its mobile phone service (Guardian, July 2013).

Tesco – Having developed a banking arm in 2008, it is almost impossible to know for sure which of Tesco's operations relate to this and which to the supermarket itself. A quite astonishing 102/575 (17.74%) tax haven subsidiaries (Action Aid 2011) – why does a supermarket need so many, compared to their competition? The 2013 figures have gone up to 107 (Action Aid). There are 36 in Hong Kong, 25 in Ireland, 14 in the Cayman Islands, 9 in the British Virgin Islands, 8 in Jersey, 5 in Luxembourg, 3 in the Netherlands, 2 each in Delaware, Switzerland and Guernsey and 1 in Mauritius. In 2007/8, Tesco made £3.4bn in profit, but avoided over £90m in stamp duty land tax, and £23m in stamp duty (Guardian, April 2008). Furthermore, through the ‘Cheshunt Overseas Limited Liability Partnership’ and a subsidiary in Zug canton, Switzerland, they’ve avoided a further £16m in tax (Guardian, May 2008). Unlike their competitors Sainsburys and Morrisons, Tesco have taken the opposite tack, and their CEO was also part of the coalition telling Cameron to tone down his anti-tax dodging rhetoric (Guardian, May 2013).

**General Retailers**

Halfords – Have 2 subsidiaries in Jersey and 2 in Gibraltar (Annual Report 2013). These are holding companies and probably function for tax purposes, although the company pay within 3% of the corporation tax expected of them. Fair Tax Mark give them a 5/15 score, mostly due to their lack of country-by-country reporting despite operations in Eastern Europe and Ireland (fairtaxmark.net, 2013).

Kingfisher – The owners of Screwfix and B&Q have previously been the target of tax campaigners when they considered changing their tax domicile in 2008 (Telegraph, Sep 2008) – this did not happen in the end. They also attracted scrutiny when they considered moving their brand licensing offshore in 2010 (Builders' Merchants News, Dec 2010). Of 187 subsidiaries, only 20 are in tax havens (10.7%) (Action Aid, 2011). This was down to 19 in 2013 – 6 in the Netherlands, 4 in Ireland, 3 each in Jersey and Hong Kong, 2 in Luxembourg and 1 in Guernsey (Action Aid).

Marks & Spencer – Scored a fairly respectable 9/15 on the Fair Tax Mark, but was pulled up on its non country-by-country reports for outside the UK, its 10% higher profit margin internationally than in the UK, suggesting profit shifting, and its use of subsidiaries in tax havens (fairtaxmark.net, 2013). The Action Aid figures in 2011 were 25/131 (19.08%), and in 2013 this had gone up to 26 – 5 in the Netherlands, 4 in Ireland and Guernsey, 2 each in Delaware, Hong Kong and Switzerland, and 1 each in Luxembourg, Singapore, Isle of Man, Cyprus, Gibraltar and Costa Rica. M&S were accused of using an Amazon-esque transfer pricing system for their online shopping. Stock was sold from the UK to an Irish subsidiary at wholesale prices, meaning a lower tax bill in the UK, while the invoicing for sales to the EU (at full retail prices) went to Ireland, at their 12.5% tax rate (Guardian, May 2013).

Next – Supplies tax and revenue data for the UK and other geographical regions, but with no breakdown of where profits are declared. Their UK tax is within 3% of expected, and provided a full list of subsidiaries, including tax haven based ones. Next have a FTM score of 8/15 (fairtaxmark.net, 2013). Next only had 7 tax haven based subsidiaries in 2011 (of 46 total). This went up to 8 in 2013. 5 of these are based in Hong Kong, the others in Delaware, the Netherlands and Guernsey (Action Aid).

WH Smiths – Another low scorer on the FTM, with just 2/15 due to lack of C-b-C, 7% lower than expected tax rate and use of tax havens (fairtaxmark.net, 2013). They have subsidiaries in Hong Kong and Jersey, but were given the ‘middle rating’ by ethicalconsumer.org in their list of ‘alternative booksellers to Amazon/Kindle’.

**Media**

BSkyB – Somewhat surprisingly, British Sky Broadcasting score fairly well, with only 12/110 tax haven subsidiaries in 2011 (10.91%), and this went down to just 10 in 2013 – 2 each in Delaware, Ireland, Luxembourg and Guernsey, 1 in Hong Kong and 1 in the BVI (Action Aid). Sky saved £40m a year using a now closed tax loophole which meant they avoided paying VAT on their subscriber’s monthly magazine (Guardian, Nov 2012). In relation to ActionAid’s data, a Sky spokesperson said that the subsidiaries identified "have either been wound up, are in the process of being wound up, or are subject to UK taxation" (The Register, May 2013). Then again, when Richard Murdoch has a controlling stake, tax is just one of your ethical worries.

Centaur Media - Taxbriefs Ltd. is owned by Centaur Media. They ran a conference in London in June called 'Taxbriefs Offshore Conference' (www.taxbriefs-offshore.co.uk/Conference, 2013**)**, which basically told attendees how to get round the new rules and keep making money offshore, and explain the difference between 'tax planning' and 'tax avoidance'. Not so much actively avoiding tax, but still implicit in the continuation of the offshore system.

Daily Mail - Unsurprisingly, DMGT (the publishing group owning the Mail) have some of the murkiest and inscrutable financial reports seen during the course of this research. They have 'taken advantage of... the Companies Act 2006', and only published the subsidiaries whose dealings 'principally affected the financial results.' Locations are only revealed vaguely. It is not made clear if the UK based companies are on the mainland, and many companies are only listed as being registered in the US - not which state. One is listed as registered in the UAE (DMGT Annual Report 2013).

ITV - 27 tax havens in 2013, 20 of which are in Delaware, 3 in the Cayman Islands, and 1 each in the Netherlands, Ireland, Hong Kong and Guernsey. This is 1 up on the 26/238 from 2011 (10.92%) (Action Aid).

Pearson - 83/411 tax haven subsidiaries in 2011 (20.19%). Up to 90 in 2013 - 48 in Delaware, 10 in Hong Kong, 8 in Luxembourg and the Netherlands, 7 in Singapore, 2 each in Jersey, the Cayman Islands and Cyprus, and 1 in Switzerland, BVI and Bermuda (Action Aid). Pearson wanted to loan $587m to its U.S. subsidiary, Family Books at Home. Instead of just doing this, with advice from PriceWaterhouseCooper, Family Books at Home was moved to Luxembourg under Pearson Luxembourg No 2, a one-man office in an apartment. Pearson UK then moved the loan to Luxembourg in exchange for shares, who then loaned it through the newly created FBH Inc. sarl to the US. The US company gets a tax break on the interest owed on the loan, and the UK never see any tax on the $587m. This was in April 2010. The Luxembourg branch and PLN2 were closed in June 2010 and their value taken into account for wealth tax in 2011 - considering all the money was transferred out before closure, the value was precisely £0 (Bing, J.I. 2012, 'Invisible Money 2: In Which We Voyage To Luxembourg And Discover Many Curious Things', groundreport.com.)

Reed Elsevier - 2011, 97/548 tax haven subsidiaries (17.7%). This went up to 101 in 2013. 68 are in Delaware, 16 in the Netherlands, 8 in Singapore, 6 in Hong Kong, 2 in Ireland and 1 in the British Virgin Islands (Action Aid). They are a dual-listed company, with headquarters in both London and Amsterdam.

United Business Media - In 2008, UBM restructured so that they were registered in Ireland, and incorporated in Jersey (Independent, Apr 2008). They then moved back to the UK in 2012 (Guardian, Oct 2012). They were involved in long running tax disputes totalling £227m in tax liabilities, of which they settled just £5.3m worldwide in 2007. These liabilities make up 74% of their total equity. Richard Murphy gives a generous estimate of £7m lost to HMRC - however, he sees this move as more of a political stunt than anything else, and thinks that if HMRC were to pursue the outstanding tax liabilities vigorously, they'd make more out of UBM after the move than they ever did as a UK resident (taxresearch.org.uk, Apr 2008).

WPP Group - WPP have a quite astonishing number of subsidiaries. Of their 2686 total in 2011, 611 are based in tax havens (22.75%). This is up to 618 in 2013. 219 in Delaware, 117 in the Netherlands, 97 in Hong Kong, 44 in Ireland, 42 in Singapore, 33 in Luxembourg, 24 in Switzerland, 10 in Lebanon, 6 in Panama and Bahrain, 4 in Mauritius, 3 in Guernsey and Costa Rica, 2 each in BVI and Cyprus and 1 in Jersey, Bermuda and the Netherlands Antilles (Action Aid). Their headquarters are in Dublin.

**Travel and Leisure**

Carnival - Carnival Cruises only paid an effective US tax rate of 1.1% on their profits of $11bn between 2004-9, due to a loophole which allows companies incorporated abroad to avoid taxes (New York Times, Feb 2011). Carnival have two headquarters, one in Miami but another in Southampton, UK - but they are incorporated in low-tax Panama (Christian Aid, 'Alternative Tax awards 2009'). Between 1995 and 2004, a study (Dyreng et al, 2008) found their effective US tax rate to be 0.7%. Carnival had 19/85 tax haven subsidiaries in 2011 (22.35%), which went up to 21 in 2013 - 6 in Delaware (perhaps unsurprising considering they're a joint US/UK venture), 4 in the Netherlands Antilles, 3 each in the Netherlands and Bermuda, 2 each in Hong Kong and (landlocked!) Switzerland, and 1 in Monaco (Action Aid).

Compass Group - 105/597 tax haven subsidiaries in 2011 (17.59%). Up to 108 in the 2013 figures - 47 in Delaware, 24 in the Netherlands, 9 in Ireland, 5 each in Luxembourg and Switzerland, 3 each in Singapore and Cyprus, 2 each in Mauritius and Isle of Man and 1 each in Jersey, Hong Kong, the Cayman Islands, the BVI, Guernsey, Costa Rica, Malta and Monaco (Action Aid).

InterContinental Hotels Group - 2011 figures have 80/254 subsidiaries in tax havens (31.50%) - although given they're a hotel group, some of these may be coincidental. This has gone up considerably to 95 in 2013 - 38 are in Delaware (definitely not hotels!), 14 in Hong Kong, 8 in the Netherlands, 7 in Cyprus, 5 in the British Virgin Islands, 4 in Singapore, 3 in Bermuda, 2 each in Luxembourg, Gibraltar, Barbados, Malta and Jordan, and 1 each in Ireland, Jersey, Mauritius, Lebanon, Aruba and the Maldives (Action Aid). They are one of the four FTSE 100 groups chosen by Christian Aid to lobby on tax dodging.

International Consolidated Airlines - Had only 9/54 tax haven subsidiaries in 2011, up to 13 in 2013. 5 in Jersey, 3 in the Netherlands and Bermuda and 1 each on the Isle of Man and in Delaware (Action Aid).

TUI Travel - In 2012, TUI Travel posted pre-tax profits of £390m, but claimed that none of this was taxable in the UK and therefore paid no corporation tax at all - it also claimed that their UK tax bill had been "eliminated due to capital allowances, losses brought forward from prior years as a result of restructuring and costs incurred by the ash cloud in 2010." Again, as a travel company it is difficult to gauge if tax haven based subsidiaries are for tax purposes or not, but TUI have 2 in the Netherlands and Singapore and 1 each in Switzerland and the British Virgin Islands. There are plenty of UK/US subsidiaries, and it is not made clear in TUI's annual report whether these are mainland or Delaware/Jersey/Isle of Man etc (TUI Annual Report 2013).

Whitbread - The Tax Campaigner's Champion, owner of Costa Coffee and Premier Inn and full UK corporation tax payer. In 2011, only had 16 tax haven subsidiaries out of 250 total (6.4%) - one of the best in the FTSE 100. In 2013, this was down again to 14 - 6 in the British Virgin Islands, 2 in the Netherlands and Ireland, and 1 each in Hong Kong, Singapore, Bermuda and Latvia (Action Aid). In spite of this, it is the fastest growing UK based company in the leisure sector, which is otherwise in trouble thanks to the recession. A positive example of how businesses do not need to cheat to succeed.

**Fixed Line Communications**

BT Group - 150/572 tax haven subsidiaries in 2011 (26.22%), which fell to 144 in 2013 - 40 in Delaware, 13 in Singapore, 12 in Ireland and Jersey, 11 in the Netherlands, 9 on the Isle of Man, 8 in Hong Kong and Luxembourg, 6 in Switzerland, 3 in the British Virgin Islands, 2 in the Cayman islands, Bermuda, Mauritius, Panama, Costa Rica and Macao, and 1 each in Cyprus, Gibraltar, Barbados, Malta, Bahrain, Lebanon, Latvia, the Seychelles, Jordan and the US Virgin Islands (Action Aid).

**Mobile Telecommunications**

Vodafone - Surely one of the worst offenders. 95/387 tax haven subsidiaries (24.55%), up significantly to 115 in 2013 - 22 in their favoured tax haven of Mauritius, 21 in Ireland, 15 in the Netherlands, 14 in Luxembourg, 11 in Delaware, 10 in Jersey, 5 in Singapore, 4 each in Hong Kong and Malta, 3 in Guernsey, 2 each in Switzerland and Bahrain and 1 in the Cayman Islands and Cyprus (Action Aid). For two years running in 2012 and 2013, Vodafone have paid no corporation tax in the UK despite £5bn in UK sales and operating profits of £294m. They claimed this was because they had made other investments in the UK such as the 3G and 4G signal infrastructure, which were used to offset their tax bill in agreement with the government (Independent, June 2013). In 2013, Vodafone made a settlement with HMRC over their previous use of an Irish subsidiary. This followed a previous deal made in 2010, when they were made to pay HMRC £1.25bn to settle an ongoing dispute over their use of a Luxembourg-based subsidiary. Furthermore, prior to this in 2009, another deal was struck with HMRC over royalties paid for Vodafone brand usage to a subsidiary based in Ireland, which then transferred said royalties to Luxembourg (Guardian, August 2013).

**Electricity**

SSE - In their first-half-of-2012 report, they stated that SSE "does not take an aggressive stance in its interpretation of tax legislation, or use so-called ‘tax havens’ as a means of reducing its tax liability." In 2013, SSE had 60 tax haven based subsidiaries, but 54 of these are in Ireland and relate to the fact that they operate in both countries. 5 of the other 6 are in the Netherlands and 1 is on the Isle of Man (Action Aid, 2013).

**Gas, Water & Multi-Utilities**

Centrica - 50/268 tax haven subsidiaries in 2011 (18.66%). In 2013, this went up to 51 - 36 in Delaware, 7 in the Netherlands, 4 on the Isle of Man, 3 in Jersey and 1 in Ireland (Action Aid). Centrica's boss has hit out at the government's tax regime which allows German-owned Npower to pay barely any corporation tax in the UK, while they have effectively paid a tax rate of 47% for 2012 (including their North Sea oil operations) (Independent, July 2013).

National Grid - 98/309 (31.72%) tax haven subsidiaries in 2011. In 2013 this went down to 93 - 57 in Delaware, 14 in the Netherlands, 7 in Luxembourg, 6 in the Cayman Islands, 3 each in Jersey and the Isle of Man, 2 in Ireland and 1 in Gibraltar (Action Aid). The finance director of National Grid, Andrew Bonfield, is also the chairman of tax committee the Hundred Group. In response to David Cameron's tax avoidance crackdown, Bonfield said "Transparency standards need to be developed, applied and enforced on a global basis to avoid the risk of regulatory arbitrage which will almost certainly disadvantage UK and EU companies" (Express, January 2013).

Severn Trent - 16/100 tax haven subsidiaries in 2011, up to 17 in 2013 - 9 in Luxembourg, 6 in Delaware and 1 each in Ireland and Gibraltar (Action Aid). The subject of a recent takeover bid by a consortium of British, Canadian and Kuwaiti investors (opendemocracy.net, June 2013). Water companies in general were accused by Deputy Leader of the Lib Dems, Simon Hughes, of paying little to no tax (Guardian, Nov 2012). A similar accusation was made by Ofwat boss Jonson Cox, who called their practices 'morally questionable' (Telegraph, June 2013).

United Utilities Group - 21/106 (19.81%) tax haven subsidiaries in 2011, way down to 14 in 2013 - 6 in the Netherlands, 4 in Jersey, 2 in Bahrain and 1 each in Ireland and the Isle of Man (Action Aid). In 2011/12 they paid £40m in taxes on £280m taxable profits - not the full corporate tax rate, but better than some other water companies who paid nothing (mancunianmatters.co.uk, Nov 2012).

**Banking**

Barclays - In 2011, the figures were 390/1069 (36.48%) tax haven subsidiaries. Pretty shocking. By 2013, this figure had rocketed to a mind boggling 471. This includes 183 in Delaware, 123 in the Cayman Islands, 31 in Luxembourg, 29 in Jersey, 28 on the Isle of Man, 13 in Guernsey, the Netherlands and Ireland, 11 in Hong Kong, 6 in Singapore, 5 in Mauritius, 3 in Switzerland and Monaco, 2 in Cyprus, Gibraltar and the Seychelles, and 1 each in the British Virgin Islands, Bermuda, the Bahamas and Liberia (Action Aid). HMRC forced Barclays to pay £500m in tax that it had attempted to avoid using two particular avoidance schemes in 2012 (BBC, Feb 2012). In February 2013, they closed down the Structured Capital Markets unit which gave customers advice on how to dodge taxes and avoided over £1bn in tax (BBC, Feb 2013). New CEO Antony Jenkins told the government that he regarded the work of his predecessor, Bob Diamond, to be 'unethical', and that he would be 'shredding his legacy' (Guardian, Feb 2013). The closure of SCM, which had made Barclays £1bn in annual profit prior to the banking crisis by magicking profit out of tax credits which were shifted around offshore havens, is the first step in Jenkins' attempt to clean up Barclays image. They have recently been scrutinised by the German tax authorities for taxes avoided between 2007-2010 using a Luxembourg based platform to generate more in tax credits than they were paying in German tax (Reuters, June 2013).

HSBC - In 2011, HSBC's numbers were 556/1528 (36.39%). This fell to 496 in 2013 - 146 in Delaware, 80 in Hong Kong (where they were originally founded), 29 in the British Virgin Islands, 26 in Jersey, 25 in Bermuda, 24 in the Cayman Islands and the Bahamas, 22 in Guernsey, 16 in Panama, 14 in Ireland and Luxembourg, 13 in Switzerland, 10 in Singapore, 8 in Ireland and Mauritius, 7 on the Isle of Man, Costa Rica, Malta and the Cook Islands, 4 in Lebanon, 2 in Barbados and Monaco and 1 in Samoa (Action Aid). In May 2013, HSBC's Argentine subsidiary was accused of helping wealthy clients to illegally evade £66m of tax (Independent, March 2013). The bank has also been rocked by major tax avoidance scandals involving a Swiss subsidiary alleged to have helped UK tax payers evade £200 million, as well as running thousands of offshore accounts in the tax haven of Jersey (ukuncut.org.uk, July 2013). Jersey used to be the home of HSBC Banking International, aka HSBC Offshore, which, under the guise of helping expats avoid UK taxes, provided assistance and advice on international tax planning. However, these offices were closed on August 5th 2013 (Wikipedia). At their recent AGM, Douglas Flint pledged to review their use of tax havens and reduce the number of tax haven subsidiaries over the next few years (Telegraph, May 2013). HMRC was involved in a long running tax dispute over dividends from HSBC's Asian and European subsidiaries being held in a Dutch subsidiary - this tax bill could potentially have been as high as £3bn (Guardian, Feb 2012). HSBC was accused in 2012 of allowing international fraudsters, drug dealers and wealthy clients to open accounts in Jersey, where they held £699m in 4388 accounts. Furthermore, they were accused of allowing drug cartels and rogue states to launder billions of pounds through US and Mexican subsidiaries. Probably the UK's worst bank in terms of tax dodging - and worse (Daily Mail, Nov 2012).

Lloyds - 297/1525 (19.48%) tax haven subsidiaries in 2011 - this went down to 259 in 2013. 59 in Jersey, 41 in Ireland, 37 in Delaware, 21 in the Netherlands and Guernsey, 20 in the Cayman Islands, 18 in Luxembourg, 10 in Hong Kong and the Isle of Man, 7 in the Bahamas, 5 in the British Virgin Islands, 2 in Singapore, Switzerland, Gibraltar and Liechtenstein and 1 each in Panama and Malta (Action Aid). After a shareholder demanded to know why the bank were the seventh biggest user of tax havens in the FTSE 100, Chief executive António Horta-Osório said Lloyds had embarked on a systematic review of "so-called tax havens", and continued to say that "In 2012 alone we have closed 60 of those companies and that is more than 20% of the total. We are going to close all of them unless there are strong business reasons for our customers to keep them there" (Guardian, May 2013). Proof that shareholder activism works.

RBS - It was reported in 2009 that RBS had avoided £500m of tax owed the UK and US, tying up £25bn in complex international tax avoidance schemes during their boom years - however, since the financial crisis, the bank has become 70% taxpayer owned and has closed the department responsible for this scheme (Guardian, March 2009). In 2012, it was reported that RBS paid £0 in tax in 2009, thanks to a (now closed) loophole whereby the bank bought back its own bonds in the market (Independent, Feb 2012).

Standard Chartered - 161 tax haven subsidiaries in 2013 (up from 144 in 2011) - astonishingly, they only have 317 total, so that was a whopping 45.43% in 2011 - and even more now. 39 in Hong Kong, 30 in Ireland, 25 in Singapore, 16 in the Cayman Islands, 13 in the Netherlands, 8 in Mauritius, 6 in Delaware and Guernsey, 5 in Jersey, 2 on the Isle of Man, Lebanon and Samoa and 1 each in Luxembourg, Switzerland, British Virgin Islands, Bermuda, Cyprus, the Cook Islands and the Seychelles (Action Aid). In 2012, a 'rogue' SC banking unit in the US violated anti-money laundering laws by scheming with Iran to hide $250bn in transactions (Telegraph, Aug 2012).

**Insurance**

Lancashire Holdings - Based in Bermuda and with offices in the City of London and Dubai. They have further controlled entities in the US (does not say where) and Jersey (Annual Report 2013).

RSA Insurance Group - 34/220 tax haven subsidiaries in 2011 (15.45%), down to 32 in 2013 - 12 in Ireland, 7 in the Netherlands, 5 on the Isle of Man, 2 on Guernsey and 1 each in Delaware, Luxembourg, Singapore, Bahrain, the Netherlands Antilles and Latvia (Action Aid). Another of the Daily Mail's Dirty Dozen, having received £8m in tax credit in 2012 despite profits of £613m - they claimed that 'due to difficult trading conditions, we made very little profit in the UK in recent years' (Mail on Sunday, May 2013).

Aviva - 68/374 in 2011 (18.18%) for tax haven subsidiaries - this is up slightly to 70 in the 2013 figures. 32 of these are in Ireland, 9 in Delaware, 8 in Singapore, 5 in the Netherlands, 4 in Hong Kong and Bermuda, 2 in Jersey and Guernsey and 1 each in Luxembourg, Mauritius, the Bahamas and Barbados (Action Aid).

Legal & General Group - 31/186 haven subsidiaries in 2011 (16.67%), up to 37 in 2013. 21 of these are in Jersey, 7 in the Netherlands, 3 in Ireland and 2 each in Delaware, Bermuda and Bahrain (Action Aid).

Prudential - 196/543 (36.10%) tax haven subsidiaries in 2011, down to 179 in 2013. 63 in Delaware, 25 in Luxembourg, 22 in Singapore, 11 in the Cayman Islands, 10 each in the Netherlands, Hong Kong and Mauritius, 8 in Gibraltar, 6 in the British Virgin Islands, 5 each in Jersey and Guernsey, 3 in Ireland and 1 in Bermuda (Action Aid). In a landmark court case in January 2013, the Supreme Court rejected an appeal by Prudential which challenged HMRC's demands to see their documents regarding tax arrangements in Gibraltar - effectively removing tax advice from the protection of legal privilege (Bloomberg, Jan 2013).

Standard Life - 30/190 (15.79%) tax haven subsidiaries in 2011, down to 29 in 2013 - 6 in Jersey, 4 in the Netherlands and Mauritius, 3 in Hong Kong and Guernsey, 2 on the Isle of Man and the Bahamas, and 1 each in Delaware, Ireland, Luxembourg, Singapore and Bermuda (Action Aid).

**Real Estate Investment Trusts**

British Land - 184/675 subsidiaries in tax havens (27%) - the vast majority of these are in Jersey (143), with a further 16 in Luxembourg (Action Aid). British Land were one of the firms consulted by the government on their Controlled Foreign Companies Working Group, which resulted in the weakening of CFC laws bought in by Labour to prevent tax dodging (www.gov.uk, 2010). Non-executive chairman Sir Chris Gibson-Smith is also chairman of the London Stock Exchange (londonstockexchange.com, April 2003).