

Could Vodafone's non-payment of tax be down to HMRC's s...

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Vodafone [reported this in 2010](#):

On 22 July 2010 Vodafone reached agreement with the UK tax authorities with respect to the CFC tax case. Vodafone will pay £1.25bn to settle all outstanding CFC issues from 2001 to date and has also reached agreement that no further UK CFC tax liabilities will arise in the near future under current legislation. Longer term, no CFC liabilities are expected to arise as a consequence of the likely reforms of the UK CFC regime due to the facts established in this agreement. The settlement comprises £800m in the current financial year with the balance to be paid in instalments over the following five years.

For the last two years Vodafone has not paid any tax in the UK.

Could it just be these events are connected? After all, under the HMRC deal Vodafone was let off all tax on its tax haven activities - giving it a licence to increase profits in them without consequence thereafter at cost to the UK.

I have no way of knowing the answer - the information is not available. But the coincidence is one to ponder.