

# Target Group Ltd (Appellant) v Commissioners for His Majesty's Revenue and Customs (Respondent)

Case ID: 2021/0189

## Case summary

### Issue

Whether outsourced loan administration services supplied by Target are standard rated supplies for VAT purposes, or if they fall under the "financial services exemption" under article 135(1)(d) of the Principal VAT Directive, implemented in the Value Added Tax Act 1994 (VATA)?

### Facts

Target provides outsourced loan administration services to customers. In May 2015, Target sought a Non-Statutory Clearance from HMRC concerning its VAT liability in respect of these services, contending that they are exempt from VAT. HMRC responded with a letter setting out its position that Target's services were vatable. Target requested a review of that decision, which HMRC upheld upon review. Target appealed to the First Tier Tribunal, which was unsuccessful. The Upper Tribunal also held that these services were vatable. Target appealed to the Court of Appeal, which confirmed the decision of the Upper Tribunal. Target now seeks permission to appeal to the Supreme Court.

### Judgment appealed

[\[2021\] EWCA Civ 1043](#)

## Parties

### Appellant(s)

Target Group Ltd

### Respondent(s)

Commissioners for His Majesty's Revenue and Customs

### Watch hearing

12 July 2023 [Morning session](#) [Afternoon session](#)

13 July 2023 [Morning session](#) [Afternoon session](#)

## Appeal

### Justices

Lord Reed, Lord Lloyd-Jones, Lord Sales, Lord Hamblen, Lady Rose

### Hearing start date

12 July 2023

### Hearing finish date

13 July 2023