

UK tax strategy

The group is committed to conducting its tax affairs and managing tax risks as follows:

- i. maintain timely compliance with all statutory requirements;
- ii. pay all taxes when due based on current legislation;
- iii. maintain systems and procedures to ensure adequate information is obtained to comply with statutory obligations within the legislative time frames;
- iv. nurture an open and collaborative relationship with the UK tax authorities in order to identify and resolve potential areas of uncertainty on a timely basis.

Approach to risk management and governance in relation to UK taxation

The UK group includes a dedicated tax team made up of professionally qualified and experienced employees.

The day-to-day implementation of the tax strategy is managed by the Group Head of Tax, who reports to the Audit Committee and Board through the Group Financial Controller.

Key tax issues are routinely brought to the attention of the Audit Committee and Board, each body takes a keen interest in the effect of our approach to tax on the interests of all stakeholders in the business.

The Group Head of Tax is also responsible for ensuring there is a framework for implementation of the policy and the identification and management of tax risks on both transactions and ongoing business activities.

Attitude towards tax planning as far as it affects UK taxation

All tax planning undertaken by the group is conducted in alignment with commercial opportunities and considerations. Research on the tax impacts at the planning stage of a transaction ensure that the risks and opportunities inherent in transactions are effectively managed.

In cases of uncertainty around tax planning for a commercial transaction, the group will seek the guidance of professional advisers.

Level of risk that the group is prepared to accept in relation to UK taxation

The group's appetite for tax risk is low. All tax risks arising from business activities are assessed for negative impacts from both a financial and reputational perspective as part of the group's risk and compliance framework. Significant tax risks are considered by the Board before strategic business decisions are taken.

Approach of the group towards its dealings with HMRC

The group pro-actively manages its relationship with HMRC and aims to maintain a collaborative professional relationship at all times. In cases of significant business events or transactions, the group will seek to inform HMRC at an early stage to discuss any tax implications and eliminate uncertainties. All correspondence and enquiries from HMRC are given due priority and dealt with in a timely manner.

We consider that the above statement complies with our obligation under para 16(2) of Sch 19 Finance Act 2016 THE ARDONACH GROUP

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