



TAX STRATEGY OF PERMASTEELISA (UK) LTD

Business Overview

Permasteelisa (UK) Ltd (the “Company”) is part of the Permasteelisa Group worldwide organization. The Group is a leading Contractor in engineering, project management, manufacturing and installation of architectural envelopes and interior systems. Permasteelisa Group is a global player in the curtain wall industry which can provide a complete business model that starts with the assistance to architects in the early stages of the projects all the way through the positive completion and post-sales services.

As a Group, it is considered to be of the utmost importance to comply with the laws and the regulations in force in any country where we operate; honesty, reliability, impartiality, loyalty, integrity and good faith are the key factors of our success. The Group acknowledges the importance of its social and ethical responsibility in business and we are committed to safeguarding the interests of our stakeholders and others with whom we interact.

The Company’s tax operations are aligned to the commitments made in the Group Code of Conduct and this is reflected in our tax strategy and tax principles as set out below.

Further details in relation to Permasteelisa Group’s Code of Conduct can be found at the following location: <http://www.permasteelisagroup.com/sustainability/code-of-conduct/>.

Purpose and Approval of the Tax Strategy

This document is in compliance with the duty of the Company (and all other UK entities in Permasteelisa Group) to publish its Tax Strategy as it relates to UK taxation in accordance with section 161 and paragraph 19(4) of Schedule 19 of the Finance Act 2016 for the year ended 31 March 2019.

The overall responsibility for the UK Tax Strategy, the supporting governance framework and management of UK tax risk ultimately sits with the Board of Directors.

To that end, the UK Tax Strategy has been approved by the Board of Directors of the Company on 27th March 2019.

Tax Risk Governance

The Company’s expected tax risk areas are identified by considering high value transactions, new and unfamiliar transactions, or transactions with which there is inherent tax complexity or uncertainty. Those risks are reduced to an acceptable level by implementing effective and proactive tax policies and procedures.

The Company provides internal and external training to its employees to maintain existing and obtain new knowledge and skills.



Where there is uncertainty over a tax filing position, the Company will seek specialist external advice or liaise with HMRC around the transactions to discuss the appropriate tax treatment.

Risk Assessment and Mitigation

In accordance with the tax strategy approved by the Board of Directors on 27th March 2019, the Company takes a conservative approach to tax risk, by recognizing and addressing tax risks due to:

- the complexity of taxes including changes in laws when they occur;
- the scope and variety of commercial and operational transactions the Company is involved with;
- the range and volume of different taxes that affect the company's activities.

All tax sensitive transactions are performed by a member of the Accounting Department, who holds the relevant tax qualifications and knowledge.

The overall supervision of all tax matter sits with the Chief Financial Officer of the Company, who reports any tax matters to the Board of Directors of the Company.

Our approach to risk is underpinned by our Code of Conduct where we seek to establish a culture of compliance by ensuring the necessary resources are in place to detect, prevent and respond to risks across the business. We have a low threshold for risk in respect of taxation and we will work with our advisers to ensure that any risks identified are dealt with appropriately and in line with our Code of Conduct.

Tax policy and compliance

Any UK tax planning undertaken by the Group will always be underpinned by a business and commercial purpose and will not compromise or conflict with the Company's legal responsibilities in regard to UK taxation.

The Company engages in tax planning in respect of direct and indirect taxes prior to the acceptance of new projects. This would be where a commercial transaction is likely to have a tax impact and the Company will make an assessment of this on a case by case basis.

As being part of a Group, transactions between the Group companies are conducted on an arm's-length basis. The Group follows and complies with all relevant EU and local laws, rules, regulations, and reporting and disclosure requirements.

The Group applies professional diligence and due care in the management of all risks associated with tax matters, and ensure governance and assurance procedures are appropriate. Where there is any uncertainty, we will seek third party advice to ensure the that any action is aligned with our Code of Conduct and expected standards of behaviour.

Tax Compliance

We are committed to meeting all of our legal and regulatory requirements and ensuring that our approach to tax compliance is appropriate for the size and complexity of the business. As part of our commitment, we comply with the Senior Accounting Officer ('SAO') requirements



PERMASTEELISA

and we undertake reviews of our tax processes (for Corporation Tax, Vat and Employment Taxes).

HMRC Correspondence

The Company keeps HM Revenue & Customs informed of business activities, results and key developments and pro-actively discloses and resolves issues, risks and uncertain tax positions.

Any inadvertent errors in submission of tax returns and tax computations to HMRC are fully disclosed as soon as reasonably practicable after they have been identified. We aim to work with HMRC to resolve any matters of complexity or uncertainty and it is important to us to maintain open lines of communication.