



Aliaxis UK – Tax Strategy 2019

This statement is published in compliance with Part 2 Schedule 19 of the Finance Act 2016 and relates to the financial year from January 1st to December 31st, 2019. This policy document will apply from the date of publication until it is superseded. It sets out the Tax Strategy for Aliaxis UK in the following four areas:

1. Our approach to **risk management and governance** arrangements in relation to UK taxation;
2. Our attitude to **tax planning** as far as affecting UK taxation;
3. Our view of the level of **tax risk** that we are prepared to accept; and,
4. Our approach towards our **dealings with H M Revenue & Customs (HMRC)**.

Risk Management & Governance

The UK businesses of the Aliaxis Group are subject to Group Policy regarding matters of taxation. Each Group company is required to ensure compliance with local laws and day to day tax management is delegated to local management. In the case of the UK businesses, this responsibility rests with their Finance Directors and the UK Accounting & Tax Manager. And relates to the financial year from January 1st to December 31st, 2019. This policy document will apply from the date of publication until it is superseded.

As an overriding principle, the Group, including its UK subsidiaries, is committed to be a responsible tax payer and to ensure solid tax compliance.

The Group does not adopt aggressive tax schemes in any of its territories, including the UK.

No decisions regarding restructuring, the legal structure of the businesses, the finance structure or third-party acquisitions and disposals are taken without referring the matter to the Group Tax Department. In addition, the Group Tax Department will become directly involved in local tax issues where the tax management and efficiency of the Group makes it necessary.

The Group Internal Audit Department performs audits of the Aliaxis UK entities on a regular basis to review the effectiveness of the internal controls.

Tax Planning

The Group strategy is to efficiently manage tax responsibilities and liabilities in every jurisdiction, but without adopting aggressive tax-saving schemes in any territory.

The Group Tax Department together with local tax management will arrange for appropriate advice and support when commercial reorganisations and restructurings are undertaken to ensure tax compliance and efficiency. The Group wishes to remain flexible and proactive to

anticipate and manage the impact of tax legislation changes in the territories in which it operates.

The Group uses the services of external tax advisers either centrally or locally when needed or required.

The UK Accounting & Tax Manager ensures that the Group is kept up to date with changes to the business environment and tax legislation affecting UK operations

Notwithstanding any formal requirement to notify HMRC, a policy of open communication with HMRC is maintained regarding significant transactions and tax saving initiatives that arise.

Tax Risk

Aliaxis Group is tax risk averse. This means that the Group seeks to account for, report on and pay the correct amount of tax in a timely manner. While the Group will look for dynamic tax management, the Group will not create or implement any artificial tax structures or arrangements for the purpose of reducing tax.

Dealings with HMRC

We maintain open communication with HMRC, its appointed Customer Compliance Manager and his team.

In addition to the annual meeting held with HMRC, we seek to keep HMRC informed about significant changes to the businesses and key events whether or not required to do so formally. If errors are found within any tax submissions, HMRC is informed on a timely basis.

We are proactive about seeking direction from HMRC regarding tax positions and computations so that agreement can be reached that will provide confidence to the businesses in its dealings.

We actively seek to maintain our assessment by HMRC with respect to our tax compliance at the lowest risk possible for the complexity of our business.

Dated: 23 December, 2019