

NORD GEAR LTD – TAX STRATEGY

OVERVIEW

Nord Gear Ltd is committed to comply with all applicable tax laws in the UK. It is recognized that taxation matters are often significant in a corporate transaction, and therefore a key objective of our strategy is to ensure that tax affairs of Nord are in good order and uncertainties are minimized.

Nord Gear Ltd has an established ethical framework such that deliberately failing to comply with tax law is unacceptable. Nord's appetite towards risk is primarily governed by the aim of retaining our low-risk rating from HMRC. We have a low tolerance to tax risk, and whilst we do not undertake transactions led by a planning purpose, we do as part of our commercial activities consider the tax consequences. When evaluating a taxation matter, consideration will be given to the level of risk, the ease of implementation and consideration of any tax reliefs or opportunities available to us that are clearly within the legislation and related HMRC guidance.

Nord Gear Ltd maintains strong internal controls & competence in corporate and transactional taxes to ensure company tax returns are properly prepared and indirect and payroll taxes are properly accounted for and reported, whilst tax guidance and advice is obtained from external tax advisors as appropriate. Reliance is placed on external advisors for advice relating to tax in the context of commercial transactions, updates and interpretations of tax legislation. Compliance is the responsibility of the business but will be monitored where appropriate by external tax advisors.

The Board of Director's for Nord Gear Ltd is responsible for overseeing the overall Tax Strategy. Appropriate accounting and financial oversight is exercised through regular review's with the UK Finance Team and external Tax advisers.

The UK Finance team reports annually to the Board. The Board is provided with a report, which provides an update on key issues covering tax and compliance matters. It is the responsibility of the UK Finance Team to ensure all taxation issues are promptly reported to the Board of Director's as soon as they become aware of them.

Nord Gear Ltd maintains open relationships with Revenue Authorities and has a transparent approach to dealing with the relevant Tax Revenue Authorities. Nord will raise any matters with HMRC, particularly to avoid uncertainty, for example where it considers that HMRC may take a different view, or where Nord is seeking confirmation of a particular approach. This tax strategy is published in accordance with paragraph 16(2), Schedule 19 Finance Act 2016

GROUP BUSINESS STRATEGY & TAX OBJECTIVES

RISK MANAGEMENT & RISK APPETITE

TAX CONTROL

STRATEGY & OVERSIGHT

MANAGEMENT REPORTING OF TAX RISK

RELATIONSHIP WITH REVENUE AUTHORITIES