UK Tax Strategy

Financial Year Ending 31 March 2020

This strategy applies to Vanderlande Industries UK Ltd.

The Company's business principles and reputation form an integral part of its approach to tax management. The tax strategy therefore reflects the Company's commitment to being a responsible business and to paying the right amount of tax at the right time.

As part of a large group, the Company is required to comply with HMRC's legislation to publish its approach to tax management. The required publication date for this company is 31 March 2020. The publication follows the first publication published in December 2016 and this publication is considered as complying with the duty under Section 19, Finance Act 2016, paragraph 22(2).

There are four key components to this policy:

1. **Approach to Risk Management and Governance**

This tax policy is approved and owned by the Board.

The Company has a tax management process covering all relevant UK taxes. That process is appropriate to the transaction levels and activities of the Company and is designed to ensure compliance with applicable tax laws, rules and regulations.

The process includes setting areas of responsibility for tax which include:

- Monthly reporting to the Board of all major tax events and updates on routine compliance.
- All employment tax and corporation tax of the Company;
- All VAT and other indirect tax of the Company;
- Transfer pricing;
- Dealing with Company tax claims and litigation (if any);
- Company restructurings;
- Report on any questions, answers and representations with HMRC which could have a wider group impact;
- Setting internal policies and procedures and adherence thereto through a business support framework of control. This framework identifies key risks and the controls to put in place to manage those risks.

2. **Appetite towards Tax Planning**

In structuring and carrying out its day-to-day commercial activities the Company is committed to seek sustainable tax compliant positions, while observing the applicable law and without obstructing the business operations, by making the most of legitimate tax opportunities and managing tax risks. Tax follows the business.

Only reputable external advisors are chosen to assist the Company where guidance or assistance is required on:

- Interpretation and understanding of a particular topic, including new laws and regulations;
- The correct approach to HMRC for a clarification on interpretation , or a clearance on a material complex matter;
- Handling of all tax compliance obligations and requirements under applicable tax laws, rules or obligations.

The tax advisor of choice is expected to pro-actively inform the Company on any developments in tax legislation affecting the Company and on any tax planning or savings opportunities.

3. Approach to dealings with HMRC

It is the Company's policy to be transparent and pro-active in all interactions with HMRC. The Company always tries to maintain a good and open relationship, as well as clear communication, with HMRC. If and where appropriate and possible, the Company will pro-actively disclose relevant information to HMRC in advance in respect of material tax events to ensure clarity, or volunteer on certain tax matters on a real time basis to minimize tax risk. When seeking clarity from HMRC, all relevant facts and circumstances of the situation will always be provided.

For example, where errors have arisen and are discovered by the Company they will be corrected and revised systems and controls put in place internally to minimize future occurrence. A review will be carried out to establish the past occurrences of the problem and, if necessary the appropriate disclosure to HMRC will be made.

4. Level of tax risk tolerated

When considering a material commercial transaction or restructuring or new activity, the Company will, in respect of seeking a sustainable tax compliant position:

- Try to reach clarity and agreement in advance with HMRC where it is possible and appropriate to do so;
- If this is not possible or appropriate, obtain external professional advice on the success of the tax treatment;
- Maintain flexibility in case legislation or the commercial operation changes.

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26 March 2020