

In compliance with the requirements outlined in Part 2 of Schedule 19 of the Finance Act 2016, AKKA Development UK Ltd (hereinafter “**AKKA UK**”), a company part of the AKKA Group, is publishing its UK Tax Strategy.

This document applies from its date of publication until superseded. The words “tax”, “tax matters”, “UK Taxation” and other similar wording should be understood within the meaning of paragraph 15(1) of the Schedule 19 of the Finance Act 2016, thus including Income Tax, Corporation Tax, PAYE, NIC, VAT and Stamp Duty Land Tax.

- **AKKA UK’s approach to tax risk management and governance**

Responsibility for AKKA UK’s tax strategy and compliance rests with the Board of AKKA UK, with oversight from the ultimate parent, AKKA Technologies SE. AKKA UK’s Finance Director is the executive officer responsible for all tax matters in relation to UK taxation, including UK tax compliance. He leads a team of appropriately qualified individuals which provides support for the day-to-day tax functions. Where necessary, additional support may be required from external advisors. Any external advice is nevertheless reviewed and approved by AKKA UK, which ensures that any resulting actions are aligned with its tax strategy. AKKA UK’s Finance Director reports to AKKA UK’s Board, which is ultimately responsible for AKKA UK’s tax strategy and ensures that the latter is considered in all significant business operations and transactions. AKKA UK has a tax risk assessment process that is part of the overall internal control environment. It ensures a proper and timely identification of tax risks and developments which could materially affect its business operations and the determination, where necessary, of risk mitigating actions.

The tax processes and controls are periodically audited by the Group internal control department which reports to the Board.

- **AKKA UK’s attitude towards tax planning and tax risks**

AKKA UK acknowledges that it should pay its fair share of taxes. Further, according to AKKA Group’s Code of Conduct¹, every employee, manager and director commits to comply with all national and international laws and regulations applicable to their field of activity.

As a matter of fact, AKKA UK does not undertake any tax planning which would be unrelated to business operations or needs. Further, tax risks are managed in a way that ensures full compliance with legal requirements. It is only with these objectives in mind that AKKA UK might seek external tax planning advice for significant and / or more complex operations or transactions.

With respect to UK taxation, AKKA UK is ready to accept a level of risk that is aligned with its overall objective of carrying business activities in a controlled environment. This is ensured by the proper and timely identification of tax risks and developments and the determination, where necessary, of risk mitigating actions allowing to reach an acceptable risk level.

- **AKKA UK’s relationship with HMRC**

AKKA UK’s policy is to cooperate in a transparent and collaborative manner with HMRC.

In this framework, AKKA UK commits to answer questions and requests for further information from HMRC in a reasonable timeframe and, in any case, within the statutory deadline.

With respect to tax filings, AKKA UK’s approach is to disclose enough information as to allow HMRC to have a clear understanding of AKKA UK’s tax situation. AKKA UK also commits to inform HMRC about any errors in tax filings as soon as practically possible after their identification.

Where necessary, AKKA UK may receive support from external advisors with the objective to meet UK tax compliance requirements in a correct and timely manner.

¹ <https://www.akka-technologies.com/app/uploads/uk-code-of-conduct.pdf>