

ATLANTIC ACQUISITION HOLDINGS UK LTD GROUP TAX STRATEGY

This document sets out the groups approach to conducting its affairs and dealing with tax risks for the year ending 31st December 2018.

The group is committed to:

- Following applicable laws and regulations relating to its tax activities
- Maintaining open and honest relationships with the tax authorities based on collaboration and integrity
- Applying diligence and care in our management of the processes and procedures by which all tax related activities are undertaken, and ensuring that our tax governance is appropriate
- Using incentives and reliefs to minimise the tax cost of conducting our business while ensuring that these reliefs are reasonably allowable for the purpose intended.

Risk management

The over-riding principle of the group is to minimise risk. The accounting function and external advisors provide input as part of the approval process for business proposals to ensure a clear understanding of the tax consequences.

Established working relationships with external advisors and a collaborative approach to working with HMRC allows the group to achieve a minimal risk approach.

Tax planning

The groups tax planning aims to support the commercial needs of the business by ensuring that the company's affairs are carried out in the most tax efficient manner whilst remaining compliant with all relevant laws. The tax function is therefore involved in commercial decision making processes and provides appropriate input into business proposals to ensure a clear understanding of the tax consequences of any decisions made.

In cases where the tax guidance is unclear or the group does not feel it has the necessary expert knowledge to assess the tax consequences adequately, external advice may be sought to support the group's decision making process.

Approach to dealing with HMRC

The group is committed to the principles of openness and transparency in its approach to dealing with HMRC, and the group commits to:

- Make fair, accurate and timely disclosure in correspondence and returns, and respond to queries and information requests in a timely fashion
- Seek to resolve issues with HMRC in a timely manner, and where disagreements arise work with HMRC to resolve issues by agreement where possible
- Be open and transparent about decision making, governance and tax planning

- Reasonably believe that transactions are structured to give a tax result which is not inconsistent with the economic consequences (unless specific legislation anticipates that result), nor contrary to the intentions of parliament
- Interpret the relevant laws in a reasonable way and ensure transactions are constructed consistently
- Ensure all interactions with HMRC are conducted in an open, collaborative and professional manner

Signed on behalf of the Atlantic Acquisition Holdings UK Ltd Group

A handwritten signature in black ink, appearing to read 'Steve Hairsine', is written over a horizontal line.

Steve Hairsine
Senior Accounting Officer