

## **Tax Strategy 2023**

In compliance with section 161 and section 19(2) of schedule 19 Finance Act 2016, the Company is publishing in its internet site its tax strategy for the year ending 31 December 2023. We confirm that this strategy will apply to the following UK company:

- Valbruna UK Limited, Oldbury Road, West Bromwich, West Midlands.

This tax strategy document has been approved by the Board of Directors of the Company on November 30, 2023.

Our business has a strong focus on corporate responsibility, and we see responsible administration and timely and accurate payment of taxes as a key responsibility of our business.

Our overall tax strategy is to:

- Timely and accurately meet all legal requirements and to make all appropriate tax returns and tax payments.
- Seek to utilise legitimately available tax reliefs and incentives where available in a manner which is consistent with the government's policy objectives.
- Consider the tax impact in major or complex business decisions.
- Operate in an environment where we consider tax also in the context of our reputation and brand.
- Comply with appropriate tax risk processes and ensure there is Board oversight into this compliance.

## **Risk management and governance arrangements**

We want our tax affairs to be transparent and fully compliant with current tax legislation. We also recognise that managing tax compliance is increasingly complex. Our internal structure is set up to ensure that:

- The Board of Directors understand the importance of tax compliance, and how it is achieved.
- There is a constant dialogue between the Board and those individuals tasked with the operation of our accounting and finance functions regarding the way our business manages its tax risks.
- The business portrays a positive view towards tax compliance and the importance of meeting all our tax obligations.

We keep under review how we meet our tax obligations, by seeking when appropriate external tax advice, investing in tax training for our Directors, Managers and staff and also how we manage our relationship with tax authorities.

## **Tax planning**

We undertake legitimate tax planning as part of our overall business strategy. Professional advice is sought on a transactional basis, with the depth of such advice being driven by our assessment of the risks presented by each opportunity.

We do not undertake aggressive tax planning, the sole purpose of which would be to obtain a tax advantage. We have a professional responsibility to minimise our tax risks as well as our exposure to penalties and negative publicity through non-compliance.

## **Attitude towards risk**

The Board sees full compliance with current tax legislation as key to managing our tax risks. We understand the importance of taxes in the wider context of business decisions and have processes in place to ensure taxes are duly considered as part of our decision making process.

We have business relationships with professional advisers that allow us to seek expert advice on specialist areas of taxation when appropriate. Our approach is to ensure we are fully compliant and understand our responsibilities with regards to taxes, rather than looking for ways to aggressively avoid payment.

The Board is conscious of the hugely negative publicity attracted by a bad attitude towards taxes, and sees strong internal processes and a good relationship with our professional advisors as the best way to manage this reputational risk.

## **Relationship with HM Revenue & Customs (HMRC)**

Our communication with HMRC is focused around timely and accurate tax compliance, for example timely meeting relevant filing and payment deadlines for the taxes the company is subject to.

We employ when appropriate the services of professional tax advisers to act as our agents, and in a number of cases they liaise with HMRC on our behalf. This is seen by the Board as a valid way to ensure we get the most out of our relationship with HMRC, thus reducing our tax risks.