

# UK TAX STRATEGY

## 1. OBJECTIVE AND SCOPE

1.1 The purpose of this strategy is to set a framework for the identification and management of the tax risks associated with JSA International Aircraft UK Limited's ("The Company's") activities, with the objective of minimizing adverse tax consequences.

1.2 In our business activities including transactions with customers, we comply with relevant tax laws including corporate taxes and file tax returns properly.

1.3 The tax strategy is to manage all taxes, to comply with the applicable local tax laws and rules while aiming to maintain overall tax costs at a reasonable level to be cost competitive, recognizing our responsibility to our stakeholders (including shareholders, employees and customers).

1.4 The strategy applies to all sources of tax risk and covers all significant types of taxation, including corporation tax, VAT, customs duties, payroll taxes (PAYE and NIC) and withholding taxes.

## 2. TAX POLICIES

2.1 The Company's tax policies cover our approach to arranging our tax affairs. Our policy covers five key components:

- i. Commitment to Compliance
- ii. Our Attitude to Tax Planning
- iii. Tax Risk Management
- iv. Relationship with Tax Authorities
- v. Board ownership and oversight

## 3. COMMITMENT TO COMPLIANCE

3.1 The Company aims to comply with tax law and practice in all of the territories in which it operates, including the UK which is our main place of business. The Company is committed to compliance with tax law and practice.

3.2 Compliance for the Company means paying the right amount of tax in the right place at the right time. It involves disclosing all relevant facts and circumstances to the tax authorities and claiming reliefs and incentives where available.

3.3 The Company will attract and retain adequately qualified and experienced tax professionals to handle its tax affairs.

3.4 Where external advisors are employed to prepare and submit tax returns, these must be reviewed and signed off by the Chief Financial Officer ("CFO") before submission to the Tax Authority.

## 4. OUR ATTITUDE TO TAX PLANNING

4.1 In tax planning, we do not engage in business activities and transactions which are regarded as tax evasion or tax avoidance.

4.2 The Company views taxes like other costs which need to be managed. The tax strategy is aligned with business and commercial strategy with tax planning opportunities being evaluated within clear group parameters, considering all legitimate interests.

4.3 The Company seeks to avoid tax risks and inefficiencies in the implementation of business decisions ensuring tax positions taken, are globally consistent with its ultimate Group parent company and standardized wherever possible.

4.4 The Company will employ legitimate business tax structures and benefits available taking into account the intention and policy behind the UK legislative rules.

4.5 A key issue for the Company is the application of transfer pricing to its related party transactions.

4.6 The core of all our transfer pricing for the Company is compliance both with OECD Transfer Pricing Guidelines for Multinational Enterprises and with local UK tax legislation. Our approach is to use the 'arm's-length' principle.

4.7 Compliance is supported through a global transfer pricing policy and framework, which applies across the business.

## **5. TAX RISK MANAGEMENT**

5.1 In order to make an appropriate judgment on tax treatment, we evaluate tax risks preliminarily and consult with tax experts as necessary.

5.2 Given the scale / nature of our business and volume of tax obligations, risks will inevitably arise from time to time in relation to interpretation of complex law and nature of our compliance requirements. We actively seek to identify, evaluate, monitor and manage these risks to ensure they remain in line with our objectives.

5.3 The Company only contracts with skilled and experienced tax personnel.

5.4 External tax advisors may be appointed to provide advice and assistance with the tax compliance function. They may also provide ad hoc advice on transactional issues.

5.5 Where there is significant uncertainty or complexity in relation to a risk, external advice may be sought, particularly in relation to our international tax obligations.

## **6. RELATIONSHIPS WITH TAX AUTHORITIES**

6.1 In case of any tax inspections, we take necessary actions such as answering inquiries and providing required documents without delay.

6.2 The Company seeks to maintain professional, courteous and open relationships with tax authorities responding to requests and enquiries in a friendly, timely and professional manner and providing full disclosure of all relevant information.

6.3 Transparent in all dealings with tax authorities the Company will seek to minimize the extent of disputes, to achieve early agreement on disputed issues when they arise and achieve certainty, wherever possible.

6.4 The Company will be prepared to litigate where it disagrees with a ruling from HMRC or decision of tax authority but only after it has first sought to resolve the disputed matters through active and open discussions with the relevant tax authorities.

6.5 The CFO is ultimately accountable for how relationships with tax authorities are managed.

## **7. BOARD OWNERSHIP AND OVERSIGHT**

7.1 We maintain the necessary and effective tax governance for proper processing, calculation, filing and payment.

7.2 This tax policy is aligned with our Code of Ethics and is approved, owned and overseen by the Board.

The Company regards this publication as complying with the duty under paragraph 22(2) and paragraph 23(4), Schedule 19 FA16.

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