

XMA Holding Limited – Group Tax Strategy

Scope

The Group's tax strategy is to maintain the good standard of tax compliance with local law and international guidelines.

This strategy applies to the XMA Holdings Ltd group in accordance with schedule 19, paragraph 16 of the Finance Act 2016 and applies from the date of publication until it is superseded.

Internal Governance

The Group's tax strategy is designed to be consistent with and support the business strategy and corporate ethics, values and governance.

Tax is ultimately the responsibility of the Chief Financial Officer (CFO) who sits on the board and is the Senior Accounting Officer. Day to day tax matters are delegated to the Financial Controller (FC) and a team of in-house professionals who hold a combination of qualifications and experience appropriate to their roles.

The Chief Financial Officer and Financial Controller liaise with external tax professionals to ensure the Group continues to comply with good practice. The Chief Financial Officer reports directly to the board on any matters that may affect tax matters.

Risk Management

Tax risks are assessed as part of the Group's formal governance process and are reviewed by the CFO and FC on a regular basis.

The management of the Group's tax affairs is a complex process across all areas of the business. These complexities run the risk in the incorrect application of tax rules or the calculation of tax returns. Therefore, internal controls and processes are in place to eliminate, or reduce such risks down to an acceptable level.

Tax risks are assessed managed on a case-by-case basis. In any cases of uncertainty in the application of relevant tax law, specialist external advice may be obtained to aid the decision-making process.

Tax Planning Approach

The Group has a responsibility to its stakeholder to deliver value and will only engage in reasonable tax planning that is aligned with commercial and economic activity. Tax will be paid in the jurisdiction that commercial activities take place.

The CFO is involved in the Group decision making process and ensures that there is a clear understanding of the tax consequences of any decisions made.

The Group will not be structured to generate profits in favourable tax jurisdictions unless there are genuine commercial reasons for being in those tax jurisdictions. The Group will not enter into transactions that have a main purpose of gaining a tax advantage or make interpretations of tax law that are opposed to its original spirit.

The Group is likely to take the most tax efficient route that delivers commercial aims, subject to due consideration of the Group's reputation and the relationship with tax authorities.

The Group will only acquire businesses for strategic purposes and not to take advantages of tax opportunities such as tax losses. New companies will only be located in the tax jurisdiction where there will be genuine commercial activity and not because of the tax regime in that jurisdiction.

Relationship with the Tax Authorities

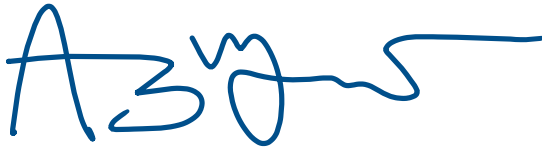
An important part of the Group's tax strategy is to maintain and develop its strong, proactive relationship with HMRC. The Group values its low-risk status and maintains an open dialogue with HMRC and updates them on business activities, results and key developments as they arise. The Group will always seek the views of HMRC on any uncertain tax positions.

Any issues or disagreements with HMRC are aimed to be resolved in advance of returns being filed or by working with HMRC to obtain resolution by agreement in a timely manner.

Further Information

This document is the formalisation of our current practices and sets out the Group's approach to conducting its tax affairs and dealing with tax risks for the year ending 31 December 2022. It will be reviewed and updated annually.

Approved by Tony Taylor (CFO), on behalf of the board of Directors of XMA Holdings Limited

A handwritten signature in blue ink, appearing to read 'ATaylor', with a long horizontal flourish extending to the right.

Publication Date: 17/06/2022