



SUCAFINA

Sucafina Group
Geneva, Switzerland

Company Manual

Policy no. POL-043

UK Tax Strategy Policy

Document status

Date	Oct. 2023	Prepared by	Approved by
Revision	00	D. Beringer	Group CFO
No. of pages	03		

Change Control

Revision no.	Description of change(s) and/or review process	Date of change

Related forms

Form no.	Title of form	Location

Affected employees

	All SUCAFINA employees working on UK tax position	
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1) Objective of the policy

This document sets out the policy and approach of Sucafina Holding SA and its UK subsidiary Sucafina UK Ltd in respect of its UK tax matters.

2) Scope of the policy

This statement has been published to comply with our duty under paragraph 16(2) of Schedule 19 of the Finance Act 2016 and is applicable to the year ended 31 December 2022.

3) Policy

3.1 The approach to risk management and governance arrangements in relation to UK taxation:

Sucafina ensures the UK tax strategy is always consistent with the group's overall strategy, the group's approach to risk and the group's values. Appropriate proactive and real-time support is provided to all areas of our business operations to maximise commercial opportunities and minimise risk.

Sucafina aims to achieve the optimal tax position for the group. This does not mean the lowest tax result but rather a sustainable approach that gives comfort that tax positions should prevail over the longer term. At no time shall commercial objectives override compliance with tax laws and regulations.

3.2 The attitude of the group towards tax planning (so far as affecting UK taxation):

Sucafina is focused on complying with all relevant laws, rules, regulations, documentation, and disclosure requirements wherever it operates, to ensure the group pays the right amount of tax at the right time.

We will only take advantage of tax planning to support our business strategy and all decisions will have a commercial rationale and be compliant with the tax laws applying to our business. We recognize there is sometimes more than one tax outcome in commercially motivated transactions. We will not engage in artificial tax arrangements, tax schemes or structured transactions in a manner that we believe are contrary to the spirit and the clear intentions of the concerned tax legislation.

We seek to minimize the risk of uncertainty or disputes. If there are questions on the application or interpretation of tax law or regulations, we will proactively seek advice from independent expert advisers evidencing the facts, risks and conclusions to support our decisions. The tax team employs various risk management processes to provide comfort as to the accuracy and integrity of information.

3.3 The level of risk in relation to UK taxation that the group is prepared to accept:

Sucafina ensures the UK tax strategy is always consistent with the group's overall strategy. The tax team works with the commercial teams to ensure key business decisions are made with a full understanding of the tax consequences.



Various factors are always considered including, but not limited to, the financial impact, the impact on the group's reputation, and the impact on relationships with external stakeholders.

3.4 The approach of the group towards its dealings with His Majesty's Revenue & Customs ("HMRC"):

We engage with HMRC in a constructive and professional manner based on the principles of integrity, transparency and mutual respect. All information requests from HMRC are processed in as timely a manner as possible to ensure the data provided is accurate and complete.

4) Additional information

The Finance Dpt is available to assist, specifically our internal tax specialist.

Furthermore, you should not hesitate to contact the Risk&Compliance Dpt if any aspect is not clear, and you need guidance. The last version of this policy is always the one available in the Company Manual on SharePoint. Printing this document may make it obsolete.

End of the document