

Wogen Group of Companies – Group Tax Strategy

The Wogen Group has developed a reputation since incorporation for integrity and our people take pride in doing the right thing across all aspects of our business. These principles underpin our approach to the management of tax.

We want to be clear and open on our approach so that our stakeholders understand it. Our appetite for tax risk is low. Our business model and operating structure is straightforward and not subject to significant judgement in the application of tax law. At present we have companies in 6 countries and, for each of those countries, we endeavour to pay our fair share of tax. We do not seek to artificially manipulate our business affairs in order to unreasonably minimise our tax liabilities and aim to pay the right amount of tax in accordance with the spirit of the law in all jurisdictions.

Through implementation of our group tax strategy we plan to:

- Have clear and consistent tax policies and procedures to support our business strategy. All our tax policies and guidelines are managed and maintained by our finance function which is supported by external advisors. This ensures compliance and allows us to properly respond to global tax changes and developments.
- Proactively identify, evaluate, manage and monitor tax risks arising from our business operations to ensure they remain in line with the group's risk appetite, seeking external advice where necessary.
- Ensure that all tax returns are accurate, complete and are submitted in a timely manner through the activation of a thorough tax risk compliance management process.
- Maintain active, open and honest relationships with governments and tax authorities.
- Ensure that transactions between Wogen Group companies comply with the arm's length principles.

Our approach to dealing with HMRC has always been fully transparent and fully co-operative. We seek to be proactive when any matters arise, and we have always fully engaged with HMRC when requested to do so. We maintain an active relationship with HMRC.

We do not tolerate tax evasion of any kind, including facilitation of tax evasion by any person employed or contracted to the Wogen Group or acting on the Wogen Group's behalf. We are committed to adopt procedures which seek to prevent any such facilitation.

The Group Finance Director has overall responsibility for tax matters and is specifically responsible for the Group Tax Strategy and informing the Board of Directors of material tax planning developments and substantial tax risks. The Group Tax Strategy is approved the Group's Board of Directors on an annual basis and is periodically reviewed by the Group Finance Director in conjunction with external advisors. Any amendments to this tax strategy will be approved by the Group's Board of Directors.

The tax policy is mandatory and applies to all Wogen Group entities. This tax strategy applies to the Wogen Group for the financial year ended 30 September 2020 and will continue to apply until superseded.

The Wogen Group regards the publication of the group tax strategy above as complying with the duty under paragraph 16(2) of Schedule 19 of the Finance Act 2016 to publish the group tax strategy in the current financial year.