

## **UK Tax Strategy**

This document is produced in accordance with the requirement under Section 161 and paragraph 16(2) Schedule 19 of the Finance Act 2016 for Gruden Intermediate Holdco, Inc. (“GIHI”), ultimate parent corporation, and all UK entities in its worldwide group (group) to publish its UK tax strategy and sets out the group’s approach to tax.

### **Approach of the group to risk management and governance arrangements**

We aim to comply with all relevant tax laws and regulations. The GIHI board of directors (Board) is responsible for determining our approach to tax. The Executive Vice President and CFO (“EVP/CFO”) has specific operational responsibility for tax with input and guidance received from the group’s global tax team.

Our tax risk management and governance arrangements include the following key elements:

- Competent and qualified internal finance resource.
- Board level commitment to making the appropriate external resource available to the finance function to supplement internal resource to ensure specific tax advice can be obtained when needed. This external resource includes appointing appropriate professional advisers to prepare and submit relevant tax returns to ensure our tax compliance obligations are met.
- Internal processes which ensure that the necessary information to support accurate tax filings is collated, verified, reconciled and communicated to our advisers.
- The global tax team, in conjunction with external advisers, monitors the wider tax environment for developments and legislative changes that could impact the group’s tax position.
- The EVP/CFO communicates business changes and developments to the global tax team. If required, the global tax team will seek input from external advisers in order to determine the relevant tax treatment in relation to any changes.

### **Attitude of the group towards tax planning (so as affecting UK taxation)**

We make use of tax reliefs which are intended to apply to our business activities having taken appropriate professional advice that relief is available. The group does not intend to undertake tax planning it considers might adversely impact its relationship with Her Majesty’s Revenue and Customs (HMRC) or reputation with our wider stakeholder community.

### **The level of risk in relation to UK taxation that the group is prepared to accept**

We seek to correctly apply the tax legislation to our business operations and, in so doing, strive to minimize tax risk. We recognize that tax legislation can be complex and sometimes subject to interpretation and this uncertainty could give rise to tax risk. If the event of such uncertainty arises, we would expect to take expert independent advice and to not take any tax positions that have less than

50% chance of being sustained under audit based on technical merits. Should significant uncertainty remain after taking independent advice, we expect to consult with HMRC to obtain their view. The group is also prepared to accept tax risk in order to defend a technical view it considers to be correct in law having taken appropriate independent advice.

**The group's approach towards its dealings with HMRC**

We adopt an open, honest, and professional approach towards HMRC. Should a disagreement over tax arise, we would endeavor to work collaboratively with HMRC to seek to resolve the matter by agreement where possible.