

TAX STRATEGY REPORT OF LINDENMEYR INTERNATIONAL LTD.

Lindenmeyr International Ltd is incorporated in England within the United Kingdom and is a part of the Central National Gottesman group.

Lindenmeyr International Ltd regards this publication as compliant with its duties under Part 2 of Schedule 19 Finance Act 2016 for the year ended 31 December 2020.

References to 'UK taxation' are to the taxes and duties in the UK including, where applicable, but not limited to, corporate income taxes, VAT and PAYE.

- **An outline of our tax planning motives**

We consider taxes as an important aspect of our Group's social and economic contribution all around the world, complementing our desire for commercial outcome in a tax-effective manner.

We see it as our responsibility to act as global corporate actors in compliance with applicable tax laws and regulations. We favor ethical and transparent business practices and avoid locations that offer tax avoiding opportunities.

- **Key roles and their responsibilities**

Directors of the company are responsible for selecting and applying suitable accounting policies, preparing financial statements and other reports in accordance with applicable laws and regulations as well as complying with obligations to the tax authorities.

Directors, on the other hand, hire reliable and suitably experienced people in key positions who can adopt an objective view of generally understood laws and regulations in all the jurisdictions where we operate.

Given the size of our operations, we also rely on external specialists who provide support in respect of compliance and reporting functions, subject to oversight by the Board.

- **Systems and controls in place to manage tax risk**

Aside from daily reviews of processing of journal entries, monthly reports are monitored for exceptional items at the higher Group level, including adjustments.

- **Our approach to risk management and governance arrangements in relation to UK taxation**

Being a part of a multinational group, we follow corporate guiding principles which are in line with the endeavor that “in every transaction, the very name of this organization should carry with it an assurance of thorough understanding, absolute integrity and the utmost in service”. (D.S.Gottesman, former CEO of the parent Central National Gottesman Inc.)

When the commercial and tax aspects of a particular transaction are in question, decisions are driven by commercial merit even if the relevant transactions are less tax-effective.

We strive to meet internationally recognized standards by applying transfer pricing policies such as the arm's-length principle.

- **The need to seek external tax advice**

Due to the size of operations in UK, working with suitably experienced and recognized tax advisors to assist us on tax compliance is both the most effective and cost-efficient way for our company to act in accordance with the respective tax laws.

We also ask for external advice for issues related to transfer pricing, such as benchmarking analyses and corporate restructuring.

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

Our company's tolerance for tax risk is low. Aggressive tax planning is not a part of our business and external advice is sought where necessary. The Directors manage UK tax risk by seeking specialist advice on areas of uncertainty or complexity.

- **Our approach to its dealings with HMRC**

Given the size of our operations, we do not have a dedicated CRM and therefore have limited direct contact with HMRC except where required by law. However, we consider HMRC published Guidance in making decisions and would seek HMRC input on any areas of significant risk or uncertainty. We regard disclosure and transparency in all tax matters as an important part of our relationship with HMRC and handle our tax computations and returns accordingly.