

# Senior plc Group's Approach to Tax

#### About us

Senior is an international engineering solutions provider. Senior designs, manufactures and markets high-technology components and systems for principal original equipment producers in the worldwide aerospace, defence, land vehicle and energy markets. Senior is structured across two divisions, Aerospace and Flexonics servicing the structures, fluid conveyance systems, gas turbine engine, land vehicle emission control and industrial process control sectors.

The Senior plc Group is headquartered in the UK, with 26 operations in 12 countries and our approach to tax is applicable to the way we conduct ourselves in the UK as well as all other countries we operate in.

The approach is aligned with the principles set out in the Senior plc Code of Conduct which underpins the way we go about our day to day business across the Group and places integrity and ethical behaviour at the heart of what we do.

#### **Governance Framework**

The group tax department forms part of the head office finance function reporting to the Group Finance Director and the Senior plc Board through its committees and delegations, with the approach to tax established and overseen within this framework. The Audit Committee of Senior plc Board is also updated biannually on significant tax developments across the group including legislative changes and areas of tax uncertainty.

#### **Application**

Our approach to tax has four key elements:

### 1. Compliance

We are committed to being fully compliant with the tax laws, regulations and disclosure requirements in the countries we operate in.

Compliance means observing all applicable rules and regulations, paying all taxes when due and making all relevant filings within the requisite timeframes. It involves disclosing relevant and appropriate facts to tax authorities in self-assessment returns, when requested by tax authorities or when seeking clarification on tax filing positions.

We strive to be in line with best practice in all respects of our tax compliance and where appropriate we will make use of external advisors to assist us.

## 2. Uncertainty and tax risk management

Given the size and geographic footprint of our business we are inevitably exposed to areas of tax uncertainty arising from the complexity of tax laws and the pace of legislative change.

We manage this risk by employing appropriately qualified and experienced tax professionals, actively monitoring legislative developments in order to anticipate and prepare for change and by developing our operating systems and compliance processes to identify and address areas of tax uncertainty.

We will not undertake actions where the tax outcome may be considered likely to be challenged or speculative. Where appropriate we will consult with external advisors and tax authorities to clarify tax positions in advance.

## 3. Approach to tax planning

We have a responsibility to manage and control the costs of our business including the taxes we pay for the benefit of all our stakeholders. Accordingly, we seek to conduct our business affairs in a way that is efficient from a tax perspective including claiming available tax reliefs and incentives. We also take steps to pay the right amount of tax in the countries we operate in through the use of appropriate Transfer Pricing and to structure our activities to reduce the incidence of double taxation of the same profits.

We will only undertake tax planning in line with and to facilitate the overall business strategy and objectives of the group.

## 4. Relationships with tax authorities

We are committed to building and maintaining constructive working relationships with HMRC, other overseas tax authorities and related regulatory bodies in the countries that we operate in. We conduct ourselves in a spirit of integrity, honesty and transparency in our dealings with and disclosures to tax authorities and where appropriate seek to agree positions where there is uncertainty on a real time basis.

We consider this document to comply with our responsibility in the UK to publish a group tax strategy in accordance with Part 2 of Schedule 19 FA 2016. It will be reviewed and updated annually via <a href="https://www.seniorplc.com">www.seniorplc.com</a>.