

# TAX STRATEGY OF SEKO LOGISTICS GROUP LTD

## ***Business Overview***

Seko Logistics Group Ltd (the "Company") is a member of the US headquartered SEKO Group, a private equity backed business. The Group is a leading global logistics and supply chain management business that provides e-commerce solutions, value added freight forwarding and specialist white glove services that enable their clients to trade across borders.

SEKO Group has over 150 offices in 60 countries worldwide, allowing their clients to benefit from specific industry sector expertise with vital in-country knowledge.

Key services for the group include:

- 1- Air, ocean and road freight.
- 2- Customs clearance.
- 3- Contract Logistics and Warehouse management.
- 4- Ground transportation.
- 5- Smart border service.
- 6- Ecommerce logistics & delivery services
- 7- White glove delivery service and asset management

The Company's tax operations are aligned to the commitments made in the Group Code of Conduct and Ethics and this is reflected in our tax strategy and tax principles as set out below.

## ***Purpose and Approval of the Tax Strategy***

This document is in compliance with the duty of the Company (and all other UK entities in Seko Group) to publish its Tax Strategy as it relates to UK taxation in accordance with section 161 and paragraph 19(4) of Schedule 19 of the Finance Act 2016 for the year ended 31 December 2023.

The overall responsibility for the UK Tax Strategy, the supporting governance framework and management of UK tax risk ultimately sits with the Board of Directors.

To that end, the UK Tax Strategy has been approved by the Board of Directors of the Company on 27 June 2023.

## ***Tax Risk Governance***

The Company's expected tax risk areas are identified by considering high value transactions, new and unfamiliar transactions, or transactions with which there is inherent tax complexity or uncertainty. Those risks are reduced to an acceptable level by implementing effective and proactive tax policies and procedures.

The Company provides internal and external training to its employees to maintain existing and obtain new knowledge and skills.

Where there is uncertainty over a tax filing position, the Company will seek specialist external advice or liaise with HMRC around the transactions to discuss the appropriate tax treatment.

### ***Risk Assessment and Mitigation***

In accordance with the tax strategy approved by the Board of Directors on 27 June 2023, the Company takes a conservative approach to tax risk, by recognizing and addressing tax risks due to:

- the complexity of taxes including changes in laws when they occur;
- the scope and variety of commercial and operational transactions the Company is involved with;
- the range and volume of different taxes that affect the company's activities.

All tax sensitive transactions are performed by qualified member of the Accounting Department. The overall supervision of all tax matters sits with the Chief Financial Officer of the Company, who reports any tax matters to the Board of Directors of the Company.

Our approach to risk is underpinned by our Code of Conduct and Ethics where we seek to establish a culture of compliance by ensuring the necessary resources are in place to detect, prevent and respond to risks across the business. We have a low threshold for risk in respect of taxation and we will work with our advisers to ensure that any risks identified are dealt with appropriately and in line with our Code of Conduct and Ethics.

### ***Tax policy and compliance (business attitude to tax planning)***

Any UK tax planning undertaken by the Group will always be underpinned by a business and commercial purpose and will not compromise or conflict with the Company's legal responsibilities in regard to UK taxation.

The Company engages in tax planning in respect of direct and indirect taxes prior to the acceptance of new projects. This would be where a commercial transaction is likely to have a tax impact and the Company will assess this on a case-by-case basis.

Whilst seeking to minimise tax liabilities, the company's policy is not to take an aggressive interpretation of tax legislation or use artificial tax avoidance schemes.

As being part of a Group, transactions between the Group companies are conducted on an arm's-length basis. The Group follows and complies with all relevant international and local laws, rules, regulations, and reporting and disclosure requirements.

The Group applies professional diligence and due care in the management of all risks associated with tax matters and ensures governance and assurance procedures are appropriate. Where there is any uncertainty, we will seek third party advice to ensure that any action is aligned with our Code of Conduct and expected standards of behavior.

### ***Tax Compliance (level of risk our business is prepared to accept for UK taxation)***

We are committed to meeting all our legal and regulatory requirements and ensuring that our approach to tax compliance is appropriate for the size and complexity of the business. As part of our commitment, we comply with the Senior Accounting Officer ('SAO') requirements, and we undertake regular reviews of our tax processes (for Corporation Tax, Vat and Employment Taxes) and we consider our risk level to be low.

We consider ourselves to be a proactive company by ensuring that we are aware of any developments in tax legislation and the implications for the business, including the OECD.

***HMRC Correspondence (how our business works with HMRC)***

The Company keeps HM Revenue & Customs informed of business activities, results and key developments and pro-actively discloses and resolves issues, risks and uncertain tax positions.

Any inadvertent errors in submission of tax returns and tax computations to HMRC are fully disclosed as soon as reasonably practicable after they have been identified. We aim to work with HMRC to resolve any matters of complexity or uncertainty and it is important for us to maintain open lines of communication.