

Tax Strategy for the accounting period ended February 28, 2023

In accordance with the requirements of Part 2 of Schedule 19 Finance Act 2016, we have set out below the tax strategy in respect of InComm Europe Limited (“the Company”) for the accounting period ended February 28, 2023.

This document is publically available on the Company’s website and was originally published on August 1, 2023

This document provides commentary in respect of:

- i. The Company’s approach to risk management and governance arrangements in relation to UK taxation;*
- ii. the attitude of the Company towards tax planning (so far as affecting UK taxation);*
- iii. the level of risk in relation to UK taxation that the Company is prepared to accept; and*
- iv. the approach of the Company towards its dealings with HMRC.*

At the Company, it is our mission to be the network that transforms the global commerce experience through innovative payment technology for retailers, brands, and consumers. Our policy is to conduct all of our business in an honest and ethical manner and strive to abide by the high standards of employee conduct.

The Company is committed to managing its tax matters and tax risks as follows:

- i. maintain timely compliance with all statutory requirements;*
- ii. pay all taxes when due based on current legislation;*
- iii. preserve systems and procedures to ensure adequate information is obtained to comply with statutory obligations within the legislative time frames;*
- iv. cultivate an extended and synergetic relationship with the UK tax authorities in order to identify and resolve potential areas of uncertainty on a timely basis.*

Approach to risk management and governance in relation to UK taxation

The Company engages with an external UK accounting firm that has a dedicated tax team made up of professional, qualified, and experienced employees.

The day-to-day implementation of the tax strategy is managed by the Vice President, Head of Tax, who reports to the group's Chief Financial Officer and the Board.

When key tax issues arise, they are brought to the attention of the Vice President, Head of Tax, who takes a strong interest in the effect of our approach to tax on the interests of all stakeholders in the business.

The Vice President, Head of Tax is also responsible for ensuring there is a framework for implementation of the policy and identification and management of tax risks on both transactions and ongoing business activities.

Attitude towards tax planning as far as it affects UK Taxation

Any tax planning that the Company undertakes is conducted in alignment with economic opportunities and considerations. Due diligence research surrounding the potential tax impacts is performed during the preliminary stages of a transaction. This research is to ensure that management has effectively identified the risks and opportunities within the underlying transaction.

In the event there is uncertainty around the tax planning phases for a commercial transaction, the Company will engage with professional advisers to seek guidance.

Level of risk that the Company is prepared to accept in relation to UK taxation

The Company's acceptance for tax risk is low. As part of the Company's risk compliance framework, all tax risks arising from business activities are reviewed for consequential impacts from both a reputational and financial perspective. Substantial tax risks are presented by the Vice President, Head of Tax to the group's Chief Financial Officer before strategic decisions are taken.

Approach of the Company towards its dealings with HMRC

The Company proactively manages its relationship with HMRC and is committed to being in full compliance with all the various UK filing requirements, statutory obligations, and/or tax disclosures. Any HMRC correspondence and enquiries are considered high priority to the Company and are dealt with in a prompt manner. In the event of substantial business events or transactions, the Company will seek professional advice from its UK tax adviser and will apply for all relevant statutory clearances. In the event of any genuine uncertainties around the application of tax law to a specific transaction or event, the non-statutory clearance route would be considered to obtain HMRC's view.