

## Tax Strategy

### Scope

This tax strategy applies to *idverde* UK Limited and to the subgroup of companies headed by *idverde* UK Limited in accordance with paragraph 19 of Schedule 19 to the Finance Act 2016. In this tax strategy, references to '*idverde* UK' or 'the Group' are to all these entities, taken together.

This tax strategy applies from the date of publication until it is superseded. References to 'UK Taxation' are to the taxes and duties set out in paragraph 15(1) of the Schedule which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Land Tax. References to 'tax', 'taxes' or 'taxation' are to UK Taxation and to all corresponding worldwide taxes and similar duties in respect of which the Group has legal responsibilities.

This tax strategy was published on 23 December 2020 and each of the companies within the Group regards this publication as complying with their respective duties under paragraph 16(2) Schedule 19 FA 2016 in the financial year ended 31 December 2020.

### Aim

*idverde* UK is committed to full compliance with all statutory obligations and full disclosure to relevant tax authorities. The Group's tax affairs are managed in a way which takes into account the Group's wider corporate reputation in line with *idverde* UK's overall high standards of governance.

### Governance in relation to UK taxation

- Ultimate responsibility for *idverde* UK's tax strategy and compliance rests with the Board of *idverde* UK Limited.
- Executive management of the Group is delegated by the Board to the Chief Financial Officer.
- The Chief Financial Officer ('CFO') is the Board member with executive responsibility for tax matters.
- Day-to-day management of *idverde* UK's tax affairs is delegated to the Finance Director (UK), who reports to the CFO.
- The finance team, which includes the Finance Director (UK), is staffed with appropriately qualified individuals.
- The Board ensures that *idverde* UK's tax strategy is one of the factors considered in all material investments and significant business decisions taken.
- The CFO reports to the Board on *idverde* UK's tax affairs and material risks during the year.

### Risk management

- *idverde* UK operates a system of tax risk assessment and controls as a component of the overall internal control framework applicable to the Group's financial reporting system.
- *idverde* UK seeks to reduce the level of tax risk arising from its operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations.

- Processes relating to different taxes are allocated to appropriate process owners, who carry out a review of activities and processes to identify key risks and mitigating controls in place. These key risks are monitored for business and legislative changes which may impact them and changes to processes or controls are made when required.
- Appropriate training is carried out for staff outside the finance team who manage or process matters which have tax implications.
- Advice is sought from external advisers where appropriate.

### Attitude towards tax planning and level of risk

*idverde* UK manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax.

When entering into commercial transactions, *idverde* UK seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, UK tax legislation. *idverde* UK does not undertake tax planning unrelated to such commercial transactions.

The level of risk which *idverde* UK accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the Group's tax affairs. At all times *idverde* UK seeks to comply fully with its regulatory and other obligations and to act in a way which upholds its reputation as a responsible corporate citizen. In relation to any specific issue or transaction, the Board is ultimately responsible for identifying the risks, including tax risks, which need to be addressed and for determining what actions should be taken to manage those risks, having regard to the materiality of the amounts and obligations in question.

### Relationship with HMRC

*idverde* UK seeks to have a transparent and constructive relationship with HMRC through regular meetings and communication in respect of developments in *idverde* UK's business, current, future and retrospective tax risks, and interpretation of the law in relation to all relevant taxes.

*idverde* UK ensures that HMRC is kept aware of significant transactions and changes in the business and seeks to discuss any tax issues arising at an early stage. When submitting tax computations and returns to HMRC, *idverde* UK discloses all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain.

Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.