

UK Tax Strategy

Kiwa UK Limited

Financial Year Ending 31 December 2025

This strategy applies to Kiwa Holdings (UK) Limited and all its UK entities in this UK Group, specifically listed in the Appendix.

The Company's business principles and reputation form an integral part of its approach to tax management. The tax strategy therefore reflects the Company's commitment to being a responsible business and to paying the right amount of tax at the right time.

As part of a large group, the Company is required to comply with HMRC's legislation to publish its approach to tax management. This publication is considered as complying with the duty under Schedule 19, Finance Act 2016, paragraph 22(2).

There are four key components to this policy:

1. Approach to Risk Management and Governance

This tax policy is approved and owned by the Kiwa Holdings (UK) Limited Board.

The Company has a tax management process covering all relevant UK taxes. That process is appropriate to the transaction levels and activities of the Company and is designed to ensure compliance with applicable tax laws, rules and regulations.

The process includes setting areas of responsibility for tax which include:

- All employment tax and corporation tax of the Company;
- All VAT and other indirect tax of the Company;
- Transfer pricing;
- Dealing with Company tax claims and litigation (if any);
- Company restructurings;
- Setting internal policies and procedures and adherence thereto through a business support framework of control. This framework identifies key risks and the controls to put in place to manage those risks.

2. Appetite towards Tax Planning

In structuring and carrying out its day-to-day commercial activities the Company is committed to seek the most tax efficient position, while observing the applicable law and without obstructing the business operations, by making the most of legitimate tax opportunities and managing tax risks. Tax follows the business.

Only reputable external advisors are chosen to assist the Company where guidance or assistance is required on:

- Interpretation and understanding of a particular topic, including new laws and regulations;
- The correct approach to HMRC for a clarification on interpretation , or a clearance on a material complex matter;
- Handling of all tax compliance obligations and requirements under applicable tax laws, rules or obligations.

The tax advisor of choice is expected to pro-actively inform the Company on any developments in tax legislation affecting the Company.

3. Approach to dealings with HMRC

It is the Company's policy to be transparent and pro-active in all interactions with HMRC. The Company always tries to maintain a good and open relationship, as well as clear communication, with HMRC. If and where appropriate and possible, the Company will pro-actively disclose relevant information to HMRC in advance in respect of material tax events to ensure clarity, or volunteer on certain tax matters on a real time basis to minimise tax risk. When seeking clarity from HMRC, all relevant facts and circumstances of the situation will always be provided.

For example, where errors have arisen and are discovered by the Company they will be corrected and revised systems and controls put in place internally to minimise future occurrence. A review will be carried out to establish the past occurrences of the problem and, if necessary the appropriate disclosure to HMRC will be made.

4. Level of tax risk tolerated

When considering a material commercial transaction or restructuring or new activity, the Company will, in respect of seeking the most tax efficient position:

- Try to reach clarity and agreement in advance with HMRC where it is possible and appropriate to do so;
- If this is not possible or appropriate, obtain external professional advice on the success of the tax treatment ;
- Maintain flexibility in case legislation or the commercial operation changes.

Conclusion

Kiwa Holdings (UK) Limited Group board considers the above key elements to this policy set our commitment to pay the right amount of tax at the right time.

Appendix

This strategy applies to Kiwa Holdings (UK) Limited and all its UK entities in this UK Group, listed below.

Kiwa Limited

Product Compliance Specialists Ltd

IFC Group Ltd

International Fire Consultants Ltd

IFC Certification Ltd

RN Electronics Ltd

Basec Group Ltd

Basec Ltd

Gastec at CRE Ltd

CMT (Testing) Ltd

Kiwa Quality Services Ltd

Acheta Consulting Ltd

PAI Certification Ltd

Product Authentication Inspectorate Ltd

Product Authentication International Ltd

Product Authentication Group Ltd

PAI Verification Ltd

Product Authentication Inspectorate (Scotland) Ltd

Blackwood EMC Ltd

C Sense Verification Ltd

NQA Certification Limited

National Quality Assurance Limited