

Cobb Europe Limited's Tax Strategy

The information below outlines Cobb Europe Ltd.'s (the "Company's") tax strategy and risk management as it pertains to tax reporting for the year ending 30 September 2018 (published pursuant to UK Finance Act 2016).

Cobb Europe Limited is committed to the following:

- Complying with all applicable tax laws and regulations in all jurisdictions in a timely and accurate manner.
- Careful oversight of the processes and procedures involved in all tax related activities performed in the UK and ensuring that our tax governance is appropriate.
- Accurate and timely disclosure on all filings with HMRC. Working with HMRC to ensure reasonable and accurate interpretation of the law.

Risk management and Governance Arrangements in relation to UK taxation

- The Company has implemented a process across the business to ensure that appropriate governance of compliance with applicable laws and regulations is in place.
- Company personnel stays abreast of any changes in tax law through legislative updates.
- A segregation of duties is maintained between the tax preparation, review, and approval functions to ensure accuracy in reporting (including outsourcing of tasks as needed).
- All tax related documents must be reviewed and approved by appropriate management.
- The Company has low tolerance for risk of material errors in tax compliance. As such, the Company has implemented compliance policies and procedures to mitigate inaccurate reporting.
- As necessary, the Company engages 3rd party preparers to ensure adherence to applicable tax law.

Tax planning (affecting UK taxation)

- The Company aims to support the commercial needs of the business by ensuring that the business is operated in the most tax efficient manner while remaining compliant with all relevant tax laws and regulations.
- The tax function is involved in the commercial decision making process to provide thorough input as to the tax consequences of any potential activity.

Risk Level accepted in relation to UK taxation

- The Company is risk averse as it pertains to evaluating these tax consequences. As necessary, the Company engages 3rd party advisors to ensure appropriate technical tax guidance is provided.

Approach toward dealings with HMRC

The Company is committed to the following:

- Accurate and timely disclosure in tax filings, query responses, and other HMRC correspondence.
- Strive to resolve tax controversy issues with HMRC, if any, through collaborative discussion.
- Working with HMRC to ensure reasonable and accurate interpretation of the law to evaluate past, current and future tax compliance.