

APLEONA

Tax Strategy 2021

Scope

The Apleona Group has three limited companies registered in England and Wales which are wholly owned subsidiaries of Apleona Group GmbH, based in Neu-Isenburg near Frankfurt am Main. Apleona Group GmbH is owned by PAI, a private equity firm. In addition, the UK Tax Group includes a UK branch of Apleona Ireland Limited, a limited company registered in Ireland which is also a wholly owned subsidiary of Apleona Group GmbH.

Apleona Limited is an investment company which holds only investments.

Apleona UK PPP Limited (formerly Apleona PPP Limited) is a facilities management company providing facilities management services to the public sector.

Apleona UK Limited (formerly Apleona HSG Limited, registered in England and Wales) is an integrated facilities management company based in the UK, with its headquarters in London. The company provides Integrated Facilities Management, Technical, Workspace, Energy and Property and Asset Management services. We deliver services through a model that operates primarily via self-delivery of single or bundled services.

Apleona Ireland Limited (formerly Apleona HSG Limited, registered in Ireland) is an integrated facilities management company based in Ireland, with its headquarters in Dublin. The company provides Integrated Facilities Management, Technical, Workspace, Energy and Property and Asset Management services with Northern Ireland and the Republic of Ireland.

This strategy applies to the following Apleona companies and branches (the Companies):

- Apleona Limited
- Apleona UK PPP Limited
- Apleona UK Limited
- Apleona Ireland Limited

in accordance with paragraph 19 of Schedule 19 to the Finance Act 2016. The strategy has been published in accordance with paragraph 19(4) of the Schedule.

This strategy applies from the date of publication until it is superseded.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 Companies have legal responsibilities.

Aim

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

Governance in relation to UK taxation

- Ultimate responsibility for the Companies' tax strategy and compliance rests with the Board of Directors of Apleona Limited, Apleona UK PPP Limited and Apleona UK Limited.
- The Chief Financial Officer ("CFO") is the Board member with executive responsibility for tax matters.
- Day-to-day management of the Companies' tax affairs is delegated to the Chief Financial Officer ("CFO") who reports to the UK Board and is supported by the finance team.
- The Companies' finance team is staffed with appropriately qualified individuals;
- The CFO reports to the Board on the Companies' tax affairs and risks during the year.
- The CFO and Management ensure that the Companies' tax strategy is one of the factors considered in all investments and significant business decisions taken.

Risk Management

- The Companies seek 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 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

The Companies manage risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax.

When entering into commercial transactions, the Companies seek to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation. The Companies do not undertake tax planning unrelated to such commercial transactions.

The level of risk which the Companies accept in relation to UK taxation is consistent with its overall objective of achieving certainty in the Companies' tax affairs. At all times the Companies seek 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 management 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

The Companies maintain an open and honest relationship in its dealing with HMRC and use best endeavours to work in 'partnership' with HMRC in relation to their tax dealings.

The Companies ensure 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, the Companies disclose all relevant facts and identifies any transactions or issues where they consider 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.