

## **RADIAL COMMERCE LIMITED**

### **TAX STRATEGY**

#### **Introduction**

Radial Commerce Limited is the only UK company in the Radial Holdings LP (a US entity) international group.

We confirm therefore that this strategy only applies to Radial Commerce Limited.

This document, approved by the Board of Radial Commerce Limited, sets out the Company's policy and approach to conducting its tax affairs and dealing with tax risk. The document will be periodically reviewed by the Company's tax team and any amendments will be approved by the Radial Commerce Limited Board of Directors. It is effective for the year ending December 31, 2017 and will remain in effect until any amendments are approved by the Radial Commerce Limited Board of Directors.

The strategy is compliant with the UK tax strategy publication requirement set out in Part 2 of Schedule 19 Finance Act 2016.

Radial Commerce Limited is committed to responsible administration and payment of tax. Our overall tax strategy is to:

- Follow all relevant laws and regulations and to make all appropriate tax returns and tax payments.
- Seek to use incentives and reliefs to minimize the tax costs of conducting our business but we will not use them for purposes which are knowingly contradictory to the intent of the legislation.
- Maintain professional and transparent relationships with tax authorities, based on integrity and collaboration.
- Apply diligence and care in the management of processes and procedures by which all tax matters are undertaken and ensure our tax governance and assurance procedures are appropriate.

#### **Risk management and governance arrangements in relation to UK taxation**

Radial Commerce Limited takes a conservative approach to tax planning and does not pursue aggressive tax planning arrangements. However, the Company will consider undertaking a transaction in a way that achieves the same commercial result in a way that gives rise to tax efficiencies in compliance with the associated UK tax legislation.

The Company will use incentives and reliefs to minimize the tax costs of conducting its business but believes that it should pay the amount of tax legally due.

Of course, given the scale of our business, there will inevitably be risks of error or omission from time to time, which may result in the incorrect application of tax rules or calculation of tax returns. Managing tax compliance is increasingly complex and eliminating tax risks entirely is impossible, but the Company keeps under review how we meet our UK tax obligations and in cases where the Company does not feel it has the necessary expert knowledge to assess tax consequences, external tax advice will be sought from professional advisers who have suitable knowledge of the Company and hold suitable accounting and tax qualifications as well as relevant experience.

### **Attitude of the Company towards tax planning (so far as affecting UK taxation)**

The Company undertakes tax planning to support the commercial needs of the business and will consider undertaking a transaction in a way that achieves the same commercial result in a way that gives rise to tax efficiencies in compliance with the associated UK tax legislation.

We do not put in place aggressive tax planning, the sole purpose of which would be obtaining a tax advantage. We will not put in place any arrangements that are artificial or contrived.

If there is significant complexity or uncertainty as regards tax risk, external professional advice will be sought.

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

The Company aims to maintain a low UK tax risk by:

- Submitting all UK tax returns on a timely basis with sufficient information for HM Revenue and Customs (HMRC) to form an accurate view of the Company, with an adequate supporting audit trail.
- Ensuring all tax filing positions have supporting documentary evidence.
- Paying the appropriate amount of tax by the due date. Where this view may differ to the position taken by HMRC, the company aims to be transparent about the filing position taken.
- Keeping robust and accurate tax accounting arrangements.

### **Approach of the Company towards its dealings with HM Revenue and Customs (HMRC)**

Radial Commerce Limited is committed to making fair, accurate and timely disclosure in all correspondence with HMRC, including meeting relevant filing and payment deadlines for UK taxes the Company is liable for.

In its dealings with HMRC, the Company will act in a collaborative, open, honest and transparent manner at all times.

The Company engages with professional tax advisers to act as our agents who liaise on our behalf with HMRC where necessary.

The Company wishes to avoid unnecessary, time-consuming disputes with HMRC and thus minimize tax risk. Where appropriate, the Company will seek pre-transaction clearances from HMRC.