

SILS Limited Tax Strategy

Scope

SILS Limited, a limited company registered in England and Wales, is a member of the Carl Zeiss AG group of companies.

This strategy applies to SILS Limited in accordance with paragraphs 16 and 19 of Schedule 19 to the Finance Act 2016.

This strategy applies from the date of publication until it is superseded.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 SILS Limited has legal responsibilities.

Aim

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

Governance in relation to UK taxation

- Ultimate responsibility for SILS Limited's tax strategy and compliance rests with the Board of SILS Limited;
- The Finance Director has responsibility for tax at Board level and communicates with and advises the Board on the tax affairs and risks of the Company.
- The Finance director together with the Finance and Human Resources teams have ownership of the day to day management of the Company's tax affairs
- The Finance Team and Human Resources teams are staffed with appropriately qualified individuals;
- The Board ensures that SILS Limited's tax strategy is one of the factors considered in all investments and significant business decisions taken.

Risk Management

- SILS Limited operates a system of tax risk assessment and controls as a component of the overall internal control framework applicable to the company's financial reporting system;
- SILS Limited seeks to reduce the level of tax risk arising from its operations 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 Tax team who manage or process matters which have tax implications;
- Advice is sought from external advisors where appropriate.

Attitude towards tax planning and level of risk

SILS Limited manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax at the right time.

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

The level of risk which SILS Limited accepts in relation to taxation is consistent with its overall objective of achieving certainty in the company's tax affairs. At all times SILS Limited 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

SILS Limited maintains an open and honest relationship in its dealing with HMRC and will seek to work in 'partnership' with HMRC in relation to its tax dealings

SILS Limited 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, SILS Limited 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.

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