

## **Jardine Matheson – Group Tax Strategy**

At Jardine Matheson, we are committed to a high standard of compliance with the laws and regulations in all countries in which we do business, including the relevant tax laws and regulations. We strive to ensure that the conduct of the Group's tax affairs is consistent with sustainable business practices and takes due account of our societal obligations supportive of our corporate social responsibility.

### **Overall Commitment**

The Group will comply with its tax obligations, which include making all appropriate returns covering all areas of taxes and ensuring the correct amounts of taxes are paid by the due dates. We are committed to embracing the transfer pricing principles, and to paying tax commensurate with the activities we perform, the value we generate and the substance we have in a particular tax jurisdiction, in accordance with all applicable laws and regulations.

### **Tax Risk Management**

When interpretation of the law is uncertain, the Group will seek to discuss the issue with the relevant tax authorities at the time or refer to it when tax returns are filed. External advice will also be sought on matters of uncertainty or where there is no relevant specialist knowledge or experience in-house.

The Group operates a risk-based system of controls, processes and training in order to manage tax risks and minimise instances of error. The Group has a low tolerance for tax uncertainty. A high standard of compliance by operational management teams with procedures in relation to tax is regularly tested by the Group's internal audit and tax teams who report their findings to senior management, and the Board of Directors.

### **Approach to Tax Planning**

The Group, whilst adopting a prudent and low risk approach, will only utilise tax planning measures and opportunities to optimise tax efficiency where these comply with the prevailing tax legislation, and when such tax planning is aligned with the commercial and economic activities of the Group. The Group will not use artificial structures that are intended for tax avoidance without bona fide business purposes, have no commercial substance or do not meet the generally understood intention of any prevailing domestic or international law.

The Group has a zero-tolerance policy towards tax evasion, any deliberate concealment of taxable income and benefits, or facilitating others in undertaking such activities.

## **Corporate Governance**

The Group's Head of Tax manages a team of experienced tax professionals to oversee the Group's tax function and provide support to the tax, finance and human resources teams of its subsidiaries and associates.

The Group's tax team works closely with the Group Tax Director, Group Finance Director and senior finance leaders in each of the Group's subsidiaries who collectively ensure that the Group adopts the appropriate tax accounting treatment and reporting standards.

Issues of material tax uncertainty are brought to the attention of senior management at regular Management Meetings and Audit Committee Meetings, and, where applicable, escalated to the full Board of Directors. The Board has ultimate responsibility for the Group's tax policies and ensuring its principles and approach are adhered to.

The Group follows the Group Policy Manual and Code of Conduct to which all employees are required to subscribe and held to the highest standard.

## **Working with the Tax Authorities**

The Group maintains an open and proactive dialogue on tax matters with tax authorities in all applicable tax jurisdictions to foster a strong and transparent relationship. We respond to all correspondence from tax authorities on a timely and transparent manner, and proactively engage with them as appropriate to discuss relevant material tax issues and to strive to resolve any differences constructively.