

## Conzzeta Group: UK Tax Policy

### 1. Scope

This tax policy applies to the UK companies that form part of the group of companies headed by Conzzeta, AG (the "**Conzzeta Group**"). Bystronic UK Ltd., Bystronic Glass UK Ltd. and Mammut UK Ltd. (together known as "**Conzzeta UK**") consider the publication of this tax policy as complying with their duties under paragraph 19 of Schedule 19 of the Finance Act 2016 to publish a tax strategy in the current financial year. This document, published on 21<sup>st</sup> December, 2019, sets out the policy and approach of Conzzeta to conducting its tax affairs and dealing with tax risk.

### 2. Conzzeta UK Tax Policy

Conzzeta UK is committed to conducting its tax affairs consistent with the following underlying objectives:

- Compliance with all relevant laws, rules, regulations and reporting and disclosure requirements in the UK.
- Acting with integrity and applying professional diligence and care in the management of and all tax matters.
- Ensure appropriate and effective governance and assurance procedures are in place to identify, manage and monitor tax risks.
- Foster constructive, professional and transparent relationships with HM Revenue and Customs ("**HMRC**"), based on the concepts of integrity, collaboration and mutual trust.
- Where legally available and permissible, utilize tax incentives, exemptions and reliefs to minimize the tax costs of conducting Conzzeta UK's business activities.

### 3. Conzzeta Group Tax Code of Conduct

The Conzzeta Group Code of Conduct (CoC) outlines the principles detailing how employees are expected to operate in an ethical and legally compliance manner with respect to tax matters.

#### (a) Compliance with laws, rules and regulations

The Conzzeta Group is committed to observing all applicable laws, rules, regulations and reporting and disclosure requirements, in all jurisdictions where we have a business presence and/or conduct transactions. This means acting in compliance with both the spirit and the letter of the law. Our internal policies, procedures and directives are designed to ensure we achieve this compliance.

The Conzzeta Group tax team ("**Group Tax**") collaborate with the Conzzeta Group businesses to advise and provide guidance on the tax implications of our operations. Group Tax also work with the business unit tax teams ("**BU Tax**") to advise on, amongst other things, general tax compliance at the business unit level. Where necessary, external advice will be sought from third party advisers.

#### (b) Governance and Tax Risk Management

Responsibility and accountability for the Conzzeta Group's tax affairs (including Conzzeta UK) is clearly defined in our Tax Responsibility Matrix. We employ appropriately qualified and experienced individuals who make decisions at an appropriate level relative to their specific responsibilities, as determined by formal Group Regulations on Power and Responsibilities.

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As a multi-national group, Conzzeta UK can be exposed to a number of tax risks, from legal and regulatory changes to uncertainty in interpretation of the law. Our robust internal policies, procedures and controls, together with the application of diligent professional care and judgement, help Group Tax and BU Tax identify, assess, manage and monitor tax risks of Conzzeta UK. External advice may be taken from third party advisers to support our internal decision making process where, for example, there is uncertainty in the interpretation of the law or in relation to a material or non-routine transaction.

Group Tax and BU Tax, through our various internal risk management processes and systems, monitor and provide assurance that the requirements of our internal policies, including our CoC and this Tax Policy, are being met. This includes internal audit reviews of Conzzeta UK's tax compliance activity.

## **(c) Tax Planning**

The Conzzeta Group is committed to paying the amounts of taxes legally due in all jurisdictions where we have operations or enter into transactions, including the UK. Any tax structuring undertaken by the Conzzeta Group, including Conzzeta UK, will reflect the commercial and economic situation and support the needs of our business, taking into account the impact on our CoC, brand, and reputation. The Conzzeta Group will take advantage of tax incentives, exemptions or reliefs as intentionally provided for by, and in the spirit of, the law. The Conzzeta Group is committed to the arm's length standard in transfer pricing and OECD guidelines.

## **(d) Level of Tax Risk**

Conzzeta UK, adopting the same approach of the Conzzeta Group, operates a conservative policy on tax, driven by our low-risk appetite and ethical integrity. Our internal policies, procedures and matrices are designed to ensure we comply with UK tax laws, regulations and reporting and disclosure requirements and minimize our tax risks.

## **(e) Relationships with HMRC**

Conzzeta UK is committed to being open and transparent in its approach to dealing with HMRC. All dealings with HMRC are conducted in a collaborative, courteous and timely manner.

On matters where HMRC's views may differ from our own, Conzzeta UK aims to reach early agreement and achieve certainty through acting in a collaborative, open and transparent manner. If there are instances where we are unable to reach an agreement with HMRC and our position is supported by our third party advisors, we may pursue alternative methods of dispute resolution.