

Doktas Trading UK Limited – Approach to UK Taxation

Tax Policy Principles

This document sets out the approach taken by Doktas Trading UK Limited and its wholly-owned subsidiary Compenenta UK Limited (“the UK Group”) to ensure:

- its taxation obligations are dealt with in a responsible and low risk manner, and
- it pays the right amount of tax at the right time in accordance with the laws of the United Kingdom.

This document and the principles set out have been approved by the Board of Directors, which includes the Finance Director, who is responsible for the UK tax strategy, the tax control framework and ensuring the necessary training is undertaken to support the tax strategy.

UK Tax Risk Management and Procedures

The UK Group completes both direct and indirect tax returns and manages these by a series of internal and external checks. External advisers are appointed to assist the UK Group in meeting its tax obligations where applicable.

The UK Group is committed to acting with integrity and transparency with clearly defined lines of responsibility for its tax affairs ensuring decisions are taken at an appropriate level. All filings are overseen by the Finance Director.

The objective of the UK Group is to be low tax risk by aiming to:

- submit its UK tax returns on a timely basis;
- pay its tax liabilities by their due dates;
- disclose relevant details, should there be material uncertainty regarding the tax treatment of a particular transaction, in such a way that is transparent and includes sufficient detail to enable HM Revenue & Customs (“HMRC”) to consider the matter, and
- ensure that the Finance Director holds relevant qualifications, has appropriate experience and is adequately trained. The Finance Director is supported by a small team who job share to ensure continuity of skills and knowledge and by qualified and experienced external advisers

Attitude to Tax planning

The UK Group seeks to implement any transactions in a tax efficient way, utilising the tax reliefs and allowances in the manner only as intended by Parliament. The UK Group does not undertake any artificial transactions with the sole purpose of reducing UK tax liabilities.

In cases where the tax guidance is unclear or the UK Group does not feel it has the necessary expert knowledge to assess the tax consequences adequately, external advice may be sought to support the UK Group’s decision-making process.

Level of risk accepted for UK taxation

As a business that is part of an extensive wider international group, the UK Group understands its role in ensuring the right level of tax is paid in the UK. It does not suffer from any undue pressures or influence from external stakeholders, including from the wider group. As with all UK companies or UK groups, there is inevitably an exposure to some tax risk and uncertainty. The UK Group recognises this and attempts to mitigate risks and uncertainty where possible through clear policies, procedures and internal controls.

The UK Group describes itself as risk adverse regarding taxation matters and takes a low risk approach when considering significant transactions.

Working with HMRC

The UK Group does not have a specific contact at HMRC but acts in an open and honest way, as far as reasonably possible, by complying with all the disclosure obligations required of it by HMRC.

Should a situation arise where there is any uncertainty on a significant transaction, the UK Group will consider seeking any available pre-transaction clearances from HMRC. If a dispute on any tax matter were to arise the UK Group will aim to promptly resolve the matter with the agreement of HMRC.

Details of legislation complied with

This document has been published in accordance with paragraph 16, Schedule 19 of the Finance Act 2016, and relates to our accounting period ended 31 December 2021.

Dated: 20th December 2021