

TAX STRATEGY

Statement of policy from Brand Energy & Infrastructure Services UK, Ltd. (trading as “Brand”)

With operations around the world, Brand Industrial Services (BIS) provides integrated specialty services to the global energy, industrial, and infrastructure markets. In common with many international businesses, we have a responsibility to other interested parties in addition to our shareholders, which includes relevant tax authorities. As a result, we have a duty to ensure that we comply with the fiscal regulations in those territories where our presence or activities create a tax responsibility. The taxes covered include, but are not limited to: direct income taxes; indirect taxes; employment taxes and other levies.

To ensure compliance with our tax responsibilities we adopt the following principles:

- We are committed to the effective, balanced and active management of our tax affairs which look to create sustainable shareholder value;
- We conduct our business on sound commercial principles and in doing so assess all relevant costs, including tax;
- To the extent we undertake tax planning, it only takes place in countries where we have commercial substance and we operate to a high standard of certainty;
- Transactions between group companies are conducted on an arm’s length basis in accordance with appropriate transfer pricing rules and OECD principles. This ensures that profits are taxed where economic activities are performed and where value is created.

In managing those principles, we have adopted the following policies:

Tax planning: We do not engage in tax planning transactions which lack substance or a valid commercial business purpose. When considering the application of local tax legislation, we take into account both the letter of the law, the intent of the law and the range of possible interpretations. Where appropriate we seek advice from external experts to ensure that our interpretation of the law is reasonable, supportable and consistent with prevailing legislation and practices.

Tax risk appetite: in some situations, the application of local tax law may be uncertain. In such circumstances, we seek to adopt tax positions which we believe have a more-likely-than-not probability of success, on the assumption that they will be challenged and litigated on a fully disclosed and transparent basis. In assessing the likelihood of success, we consider legal precedents, local practice and the opinion of external counsel.

Relationship with local fiscal authorities: While we have a responsibility to our shareholders, we recognise that compliance with local fiscal legislation is a key element of our corporate social responsibility. Accordingly, respect, cooperation and integrity form key elements to ensure that tax audits and other enquiries are resolved on a timely and proper basis. We also believe that an open and transparent relationship is essential in our relationships with local fiscal authorities.