

## **PCU UK Tax Strategy**

The PCU Group is headed by Royal Peterson Control Union Group B.V. and is headquartered in Rotterdam, The Netherlands (“the PCU Group”).

Our UK Tax Strategy for the financial year 2025 sets out to deal with the obligations under Paragraph 19(2) Schedule 19 of the UK Finance Act 2016 and covers all UK subsidiaries of the PCU Group (see below) and all UK taxes. The UK Tax Strategy is thereby adopted by the Board of Directors of each relevant subsidiary.

## **Risk Management**

The PCU Group maintains a management system in which risk management and governance play an important role. The PCU Group faces inherent (tax) risk due to its international operations, complexity and broad range of activities. Roles and responsibilities pertaining to taxation have therefore been established in the PCU Group’s tax policy and tax standards.

The ultimate responsibility for the PCU Group’s tax strategy rests with its Group Management Team. Local tax compliance and tax planning is the responsibility of the Board of Directors of each local subsidiary. Every company within the PCU Group has the responsibility to comply with relevant tax law, provide competent authorities with the required information and pay taxes that are legally due.

External (tax) reporting requirements should be met, and all relevant documents should be prepared and filed on a timely basis. Companies within the PCU Group will therefore ensure the integrity of accounting systems and the equipping of accounting systems to enable the gathering of required information. Furthermore, knowledge of relevant technical and procedural tax law should be ensured through internal or external recourses.

Employees that are (potentially) exposed to taxes should be familiar with the PCU Group’s tax standards that describe the dos and don’ts pertaining to taxes.

Tax risks, planning opportunities and compliance statuses are reported to Group Tax, headed by the Global Head of Tax who reports to the Group CFO, as Group Tax bears the responsibility for tax governance on group level.

## **Tax Planning**

Maintaining a competitive cost level is important to the PCU Group as all business costs are ultimately reflected in our pricing toward our valued customers. The reduction of

taxes should be done in a well-balanced manner as, by its nature, paying taxes is a part of fulfilling social and environmental responsibilities.

The PCU Group strives to avoid double taxation, triggering anti-abuse regulation, losing loss-utilization opportunities and to maximize the use of tax incentives and investment schemes for the purposes for which these were designed. In striving to achieve these goals, PCU Group will only optimize actual business structures and transactions with substance. In other words, our business is leading.

The PCU Group furthermore subscribes to the view that undesired tax avoidance is generally covered by the implementation of the actions of the Inclusive Framework on Base Erosion and Profit Shifting and similar initiatives and General Anti-Avoidance Rules.

### **Risk Acceptance and Working With HMRC**

The PCU Group acts in line with the letter and spirit of (local) tax laws and tax regulations and is committed to paying the correct amount of tax at the right time. Companies within the PCU Group prepare and file all tax returns required, while providing complete, accurate and timely disclosures to all relevant tax authorities. As the spirit of the law is often hard to discern, the PCU Group sees relevant tax law in the broadest sense as the guiding measure.

The PCU Group intends to pay tax on profits according to where value is created within the normal course of commercial activity based on generally accepted international principles and contingent on local laws. Tax advice from reputable firms is sought where any tax law is unclear or subject to interpretation to ensure we remain compliant.

The PCU Group intends to build and maintain mutual professional, respectful, open and transparent relations and communication with tax authorities when and where reasonably possible.

The PCU Group aspires to full tax compliance in technical and procedural matters. Tax positions benefiting the PCU Group are only taken when objectively sufficiently substantiated and based on, at least, a reasonable interpretation of facts and applicable law. Entities within the PCU Group shall thereby only take positions in their tax returns that are deemed defensible (in the eyes of an unbiased tax expert). Non-detection is not a defensible position.

Our UK Tax Strategy for the year 2025 covers the following entities:

80:20 Procurement Services Limited

CAI Holdings Limited

Control Union (UK) Limited

Control Union Industrial Inspections Limited  
Core29 Holdings Limited  
Core29 Limited  
L S Customs Management Limited  
MacAlister Elliott & Partners Limited  
Peterson (United Kingdom) Limited  
Peterson Assets Limited  
Peterson Decom Limited  
Peterson Edzell Limited  
Peterson England Limited  
Peterson Freight Management Limited  
Peterson Fuel Limited  
Peterson People Limited  
Peterson SBS Limited  
Peterson Shetland Limited  
Peterson SNS Limited  
Seaforth Maritime Limited