

Air Navigation Solutions Limited Tax Strategy

This document sets out the strategic tax objectives for Air Navigation Solutions Limited (ANSL) as required by Finance Act 2016, Schedule 19 para 16 (2). This strategy is not designed to be an operational manual with detailed instructions on the execution of the processes. The processes and controls which support the delivery of the strategic tax objectives are regularly reviewed. Our tax strategy is reviewed annually.

The strategy covers the following areas:

- The approach of the UK subsidiary to risk management and governance arrangements in relation to UK taxation
- The attitude of the group towards tax planning (so far as affecting UK taxation)
- The level of risk in relation to UK taxation that the group is prepared to accept.
- The approach of the group towards its dealings with HM Revenue and Customs (HMRC)

The tax strategy was approved by the Board of ANSL on the 23rd August 2021, in respect of the year ending 31 December 2021.

The approach to risk management and governance

The Head of Finance takes overall responsibility for the management of tax risk. Key risks and issues related to tax are escalated to, and considered by the Board for approval as required under the Board Meeting governance.

ANSL recognise that the field of taxation is complex and constantly evolving and we actively monitor local and international developments and participate in consultation on future tax law change where we believe that it is in ANSL's best interests to do so. We manage these risks by utilising qualified and experienced finance team members and specialist external tax advisors to advise on areas of uncertainty.

In line with our core value of being true, ANSL is committed to maintaining effective procedures for the prevention of the facilitation of tax evasion by any party who acts for or on behalf of ANSL, in accordance with applicable law.

The attitude to tax planning

ANSL's appetite for tax risk is low. Our business model and operating structure is straightforward and not subject to significant judgement in the application of tax law.

We seek to be efficient in our tax affairs and in this context, we ensure that all tax planning is built on sound business activity. The economic benefits associated with tax planning must never override compliance with all applicable laws. ANSL are committed to ensuring that tax arrangements are simple, well-understood and based on best practices.

We give due consideration to ANSL's reputation and our brand in the UK and overseas, corporate and social responsibilities when considering tax planning, as well as the impact of the responsibilities and accountabilities of directors and employees of ANSL.

Level of risk the business is prepared to accept for UK taxation

ANSL adopts a conservative approach to manage our tax risk and we only structure our affairs based on sound commercial principles and in accordance with relevant tax legislation. Aggressive tax planning is not proactively considered, and ANSL does not engage in artificial tax arrangements.

We believe in safeguarding our reputation and our relationships with clients, shareholders and tax authorities alike and we are not subject to undue shareholder influence.

We will seek external tax advice in certain situations, for example:

As a second opinion in cases where we believe there is uncertainty with respect to the application of tax law, although we may also approach HMRC directly, to seek clarity or obtain clarity.

How we work with HMRC

ANSL is committed to acting with integrity at all times. We pursue a professional, courteous, and open relationship with all relevant tax authorities, governments and related third parties, in particular acting in a cooperative and transparent manner. We make appropriate disclosure of all transactions undertaken and proactively engage with HMRC to resolve issues as they arise.