

## **UK Tax Strategy**

This is the Tax Strategy for the UK subsidiaries of the CLdN Links Group (CLdN) published in accordance with paragraph 16 of Schedule 19 to the Finance Act 2016.

CLdN group is a European integrated RoRo shipping, ports and freight forwarding specialist with operations across the EU and UK. Its business and operations in the UK are conducted via registered private limited companies. CLdN is publishing this Strategy because it meets the OECD description of a multi-national enterprise and so its UK group companies are required to publish a Tax Strategy.

### **Oversight and Governance**

CLdN maintains a high standard of compliance and considers that tax evasion or complex structures to avoid payment of tax are not responsible or in line with its ESG commitments. CLdN places a very high value on the compliance with tax law by all its subsidiaries wherever they operate.

CLdN's pan-European operations mean that tax liabilities arise in numerous jurisdictions, often with differing requirements. These tax liabilities can be complex. CLdN proactively manages its tax liabilities so that it understands the specific tax requirements in each jurisdiction, any potential cross-border tax implications, and to ensure that all tax is paid in accordance with the relevant legal requirements in each jurisdiction.

The payment of tax is primarily and legally the responsibility of the directors of the respective company for which any tax is due to be paid. However, the management of tax issues is also undertaken at group level in liaison with local directors to ensure coherence and compliance across CLdN.

CLdN engages specialist legal and accountancy tax professionals to manage inherent complexities and risk. Tax advice is given at local and group level.

### **Tax Planning**

Tax planning is undertaken as part of CLdN's risk management. It is limited to ensuring that the tax liabilities of its business operations are understood in each jurisdiction and can be planned for. This will include the consequences for transactions with third parties or between companies in the CLdN group, which can have cross-border elements. Tax planning will take account of the tax consequences of a transaction, how it should be structured, and consideration of tax relief within the relevant legal framework.

CLdN has a Transfer Pricing Strategy in place in accordance with the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations and various international and national legislation. The group's Master File is reviewed on an annual basis.

### **Risk Management**

CLdN has a track record of compliance with all relevant tax law requirements and the payment of tax in the jurisdictions in which it operates. Its established corporate structure, with registered companies responsible for distinct parts of its business in each jurisdiction, means that tax liabilities relating to its operations in each country are transparent and clearly related to established, registered companies. The Transfer Pricing Strategy ensures that transactions with related parties are done on an arms' length and legally-recognised basis. Yearly financial statements are prepared and approved by the local Boards of Directors and filed with the relevant public registries.

CLdN has been working in tandem with external tax advisers to prepare and submit tax returns timely to HMRC over the last 30 years. UK taxes are paid on time and in accordance with HMRC requirements.

CLdN also obtains external specialist tax advice including from legal and accountancy professionals to inform taxation issues arising in relation to corporate matters such as real estate, commercial transactions and group structure matters to ensure tax liabilities are understood and are always met.

### **Engagement with revenue authorities**

When engagement occurs with revenue authorities in any of the jurisdictions in which we operate, CLdN does so on an open, transparent and cooperative basis.

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