

1 INTRODUCTION

Cobalt Ground Solutions Limited's (Cobalt) taxation strategy sets out the approach to achieving its tax objective. This tax strategy is applicable for the year ended 2021.

The strategy is prepared for the following purposes:

- To define Cobalt's tax objective
- To define an approved approach to tax management throughout Cobalt, including the approach to tax planning, tax risk management and relationship with local tax authorities
- As a reference for Cobalt's managers to assist in their understanding of their tax strategy
- To aid understanding of external parties, including tax authorities, of Cobalt's tax strategy

This tax strategy document is published in accordance with the requirement of Schedule 19 of Finance Act 2016 and applies from the date of publication until it is superseded.

The Cobalt tax strategy applies to all forms of taxes payable, such as direct taxes, indirect taxes, payroll based taxes etc.

Cobalt is part of the Groupe Crit S.A. group, a company listed on the Paris stock exchange. Groupe Crit S.A. is committed to comply with tax law and practices in different countries including tax filing and other compliance requirements and manages global tax risk. Conducting an artificial tax plan without business purpose is not allowed within Group Crit S.A.. Meanwhile, Groupe Crit S.A. always try to identify, assess, manage and monitor the tax risk actively. Groupe Crit S.A. engages with tax authorities with honesty, respect and fairness on tax co-operation.

2 COBALT TAX OBJECTIVE

Cobalt aims to ensure clear and demonstrable compliance with the applicable taxation laws established in the territories in which it operates.

Cobalt's tax strategy, as set out in this document, details how it aims to achieve the above objective. This covers the following areas:

- Tax planning and risk management
- Relationship with tax authorities

3 TAX PLANNING AND RISK MANAGEMENT

Tax risk arises from entering into transactions that have an uncertain tax outcome, In general, Cobalt seeks to reduce these tax risks through the following mechanisms:

- Undertaking only transactions that fairly reflect the economic substance of Cobalt's core business
- Setting transfer prices for internal transactions on an arms length basis (subject to local regulations), in compliance with OECD guidelines

Cobalt will consider the tax consequences of its transactions as a factor in its planning processes, but will not undertake tax driven transactions, created with the primary purpose of reducing its taxation charge. In the event of a conflict, commercial considerations will always take precedence over the tax consequences of a transaction.

Cobalt's internal governance is not prescriptive on any particular level of tax risk, that it is prepared to accept when considering a transaction. By engaging only in transactions that have genuine economic substance, Cobalt aims to manage its future tax risks to minimize the chances of a future unexpected tax charge relating to historical transactions.

Tax risk also arises from errors in day to day tax processes such as payroll tax and indirect tax reporting. In general, Cobalt seeks to reduce these tax risks through maintain a fully functional tax risk management framework which is supported by a robust set of documented controls.

4 RELATIONSHIPS WITH TAX AUTHORITIES

Cobalt aims to maintain an open and co-operative relationship with the tax authorities. This is expected to be achieved through:

- Providing reasonable access to local Cobalt senior managers
- Responding to questions in a timely manner
- Maintenance of appropriate taxation documentation
- Ensuring internal tax controls meet or exceed minimum regulatory standards

In certain circumstances, agreeing positions on significant tax matters or unusual transactions in advance of returns being filed

Cobalt conducts open and honest business dealings, recording transactions consistent with the economic substance of that transaction, Cobalt believes in working in a transparent and collaborative way with tax authorities. Consequently, it aims to be considered as a low risk tax payer by the tax authorities.