

## UK Group Tax Strategy

Our Group includes all UK incorporated subsidiaries which form part of the Navig8 group (the “Group”) listed below:

- Navig8 Europe Limited
- Navig8 Chemicals Europe Limited
- Integr8 Fuels Europe Limited

The purpose of this document is to outline the tax strategy of the Group in accordance with the requirements of Schedule 19 of the UK Finance Act 2016 that requires qualifying companies to annual publish their tax strategy.

This tax strategy is effective for the accounting period ended 31 March 2021 to 31 March 2024.

The Group is committed to conducting its tax affairs and managing tax risks as follows:

- maintain timely compliance with all statutory requirements;
- pay all taxes when due based on current legislation;
- maintain systems and procedures to ensure adequate information is obtained to comply with statutory obligations within the legislative time frames;
- nurture an open and collaborative relationship with the UK tax authorities in order to identify and resolve potential areas of uncertainty on a timely basis.

### *Approach to tax risk management and governance in relation to UK taxation*

The Group, with the assistance of external advisers as applicable, ensure compliance with tax laws and regulations both in the UK and internationally, and ensure that we identify, and then mitigate, any significant tax risks within our business. By being compliant and timely in managing our tax affairs is the way we as a Group aim to reduce our tax risk.

The overall financial operations of the Group are overseen by the Group Finance Director. The Group Finance Director is supported by our Global Tax Manager and Regional Financial Controller who provide updates on key issues covering tax and compliance matters. It is the responsibility of the Tax and Finance teams to ensure all taxation issues are promptly reported to the Group Finance Director as soon as they become aware of them. The UK operations are supported by the wider finance teams, based both in the UK and elsewhere.

### *Attitude towards tax planning in as far as it affects UK taxation*

The Group makes use of the services of external professional advisors in respect of taxation matters. It is the Group’s policy to consult with external advisors where the tax treatment of transactions is complex, unclear or uncertain under UK tax law.

The Group does not engage in tax planning that does not support genuine commercial activity nor does it participate in artificial tax avoidance schemes to reduce its UK tax liabilities. The Group does not seek to structure transactions in ways that give tax results inconsistent with their underlying economic consequences.

The Group's tax planning strategy is always to act within the letter and spirit of the law, where possible the Group will seek to maximise efficiency through available reliefs or opportunities available that are within the legislation and in line with Revenue and the OECD guidance.

### *Risk Review*

The Group has a low appetite for tax and regulatory compliance risk. The business regularly reviews the tax policies of the Group and professional advice is sought where it is considered that there is an unacceptable level of risk.

Due consideration is given to the Group's reputation, brand and corporate identity when considering taxation. It is the Group's policy to avoid entering into any tax planning which could result in negative publicity or damage the corporate reputation of the Group.

### *Approach to dealings with HMRC*

The Group is committed to being compliant with all UK statutory obligations, filing requirements and/or tax disclosures with UK HMRC. The Group aims to ensure that our engagement with HMRC is professional, open and honest, and undertaken in a spirit of cooperation.