

UK TAX STRATEGY

Approved by the Board: 8th October 2024

Publication Date: 1st November 2024

Heating Holdings Limited, a limited company registered in England and Wales, is a wholly owned subsidiary of Atlantic SFDT. This strategy applies to Heating Holdings Limited and all its subsidiaries ("the Group").

The Group regards this publication as complying with its duty under paragraph 19 of Schedule 19 of the Finance Act 2016 ("the Schedule").

References to "tax", "taxes" or "taxation" are to UK taxation, as defined in paragraph 15(1) of the Schedule, and all corresponding worldwide taxes and similar duties in respect of which the Group has legal responsibilities.

Risk Management and Governance

Ultimate responsibility for the Group's tax strategy and governance rests with the Board of Directors ("the Board"). The Chief Financial Officer reports to the Board on tax affairs and risks. The Tax Strategy is applied consistently to all companies within the Group.

Local management of each legal entity is responsible for ensuring regulations, internal guidelines, controls, and governance procedures are observed.

To meet our compliance obligations, the finance team is staffed with appropriately qualified individuals supported by external tax advisors.

The Board adopts a low-risk approach to the Group's tax affairs. The Group is committed to:

- Following applicable laws and regulations relating to its tax activities
- Paying all taxes in full and on time in accordance with tax law

Tax Planning

The Group's tax planning is led by the commercial activities of the business. Tax consequences are therefore assessed within the commercial decision-making process. This means artificial tax arrangements are not pursued by the Group.

The Group claims incentives and reliefs as intended by UK tax law.

Level of Acceptable Risk

As set out above the Group's low-risk approach is driven by the commercial transactions undertaken. Where judgement is required in relation to sensitive items in a tax return, we only report we believe to be in accordance with UK tax law. In such circumstances, the process followed includes due consideration by the in-house team of:

- HMRC guidance
- Case law assessments
- Published intentions of the law setters
- Third party advisor opinion

The assessment will inevitably consider the materiality of any item, we do not set defined limits on acceptable / non-acceptable risk.

Approach to Dealing with HMRC

The Group is assigned a Customer Compliance Manager (CCM) within HMRC. We maintain an open, professional, and constructive working relationship with HMRC and or CCM. This involves:

- Fair, accurate and timely disclosure in correspondence and returns
- Response to queries and information requests in a timely fashion
- Openness and transparency with respect to decision-making, governance, and tax planning
- Collaboratively working to resolve tax uncertainties or issues, where possible on a real-time basis