

Zenith Tax Policy

Policy Document

March 2018

Introduction

This document sets out the tax strategy of Zenith Automotive Holdings Limited “Zenith” and its UK subsidiary holdings.

Effectively all trading activities for Zenith are in the UK and there is therefore no cross border transfer pricing activities for us to consider or considerations to recognise profits in different tax jurisdictions.

In making this policy document available, Zenith is fulfilling its responsibilities under the Finance Act 2016.

Our Values

At Zenith we are proud of our service and ethics. Honesty is one of our core values and we apply this to our tax affairs and our dealings with tax authorities and tax advisors in the same way we apply it to all our business activities.

Our Policy

We will fulfil our commitment to paying the right amount of tax that we owe by seeking to pay the appropriate tax, at the right rate and at the right time. We aim to do this by ensuring that we report our tax affairs in ways that reflect the economic reality of the transactions we actually undertake in the course of our trade.

We are committed to paying all the taxes that we owe in accordance with the tax laws that apply to our operations. We believe that paying our taxes in this way is the clearest indication we can give of our being responsible participants in society.

Dealing with HMRC

We have built long term relationships with our tax advisors and have always discussed with them new products and services to ensure the correct tax treatment is adopted. We respond to requests in a friendly, timely and professional manner. Where the tax treatment or reporting requirements of specific items are unclear we always seek professional advice. The Senior Accounting Officer and Chief Financial Officer are involved in all these discussions.

Our advisors also keep us updated on tax law as it evolves.

In the event of an enquiry we would be committed to co-operating fully with any investigation with a view to timely resolution of issues.

Tax Risk Management

Where tax rules are complex we invest in development for our employees to ensure they have the knowledge and skills to be able to fulfil their roles competently.

All finance activities for Zenith are centralised in Leeds and the same team are responsible for all accounting and tax calculations for the group. This ensures a consistent approach to our reporting. This policy is provided to all relevant finance professionals.

All risks and instances of non-compliance are reported to the Chief Financial Officer. Material risks will be reported to the Group Board.

Responsibility

Responsibility for agreeing, issuing and communicating our policy sits with the Finance team.

As part of the Senior Accounting Officer reporting to HMRC each year, the Finance Director, Rob Butler, will review the control mechanisms and procedures the Group has in place to ensure that the Zenith Tax Policy is adhered to. This fact will be publically reported on the Group's website each year.

Our accounts will be prepared in compliance with this policy and will seek to provide all the information that users, including HM Revenue & Customs, might need to properly appraise our tax position. We will review this policy with our auditors annually to ensure that it is complied with.

Compliance with this policy and all related policies and procedures is mandatory for all staff at Zenith.

A copy of the Zenith Tax Policy will be available to all staff and published on the zenith.co.uk website

This policy has been reviewed and approved by the Board of Directors of Zenith Automotive Holdings Limited