

UK TAX STRATEGY – FINANCIAL YEAR 2022

Background

Deceuninck is a Belgian headquartered group quoted on the Brussels exchange through its ultimate parent company, Deceuninck NV (“Deceuninck”). Its UK subsidiary, Deceuninck Holdings (UK) Limited, is the parent company of the Deceuninck UK group of companies (the “UK Group”). The UK tax strategy is published to meet the reporting obligations of the UK Group under paragraph 16 (2) of Schedule 19 of the Finance Act 2016 for the financial year ending 31 December 2021. This strategy will be periodically reviewed and updated, as appropriate, by Deceuninck Holdings (UK) Limited.

This document provides more information about the tax policy, principles, risk management, and tax knowledge of Deceuninck and the UK Group. More information as available in the Annual Report:

<https://www.deceuninck.com/downloads/annual-report/Annual-report-2021.pdf>

Deceuninck Business Overview

Founded in 1937, Deceuninck is a top 3 independent designer and manufacturer of PVC and composite profiles for windows and doors. Headquartered in Hooglede-Gits (BE), Deceuninck is organized in 3 geographical segments: Europe, North America and Turkey & Emerging Markets. Deceuninck operates 17 vertically integrated manufacturing facilities, which together with 16 sales and distribution facilities guarantee the necessary service and response time to Customers. Deceuninck strongly focuses on innovation, sustainability and reliability. Deceuninck is listed on Euronext Brussels (“DECB”).

The Group’s “**Building a Sustainable Home**” mission is based on five pillars:

- Developing an innovative product range that meets key customers’ needs, supported by a strong brand
- Having the most sustainable product and production process
- Encouraging an entrepreneurial spirit to create an agile organization, with an efficient and flexible production footprint to serve the local market needs
- Fostering the best team in the industry with a focus on safety, quality and sustainability
- Keeping a healthy financial structure to support long term vision

Why: Innovation, Sustainability and Reliability

Innovation, Sustainability and Reliability are the cornerstones of our business. Through innovative designs and production processes, we deliver the most sustainable window, door and building solutions for today’s and tomorrow’s customers.

How: **Trust, Top Performance, Entrepreneurship**

Trust, Top Performance and Entrepreneurship are our core values. We embrace risk and creativity. Trust is given and received. We strive to deliver top performance for all our stakeholders. Our entrepreneurial spirit allows us to stay focused realizing our goals.

(Tax) risk management

Taking calculated risks is an integral part of operational management. The purpose of risk management is to identify and to manage the risks. The Group selected the ISO 31000 standard as framework for its risk management system. The following steps can be distinguished within this framework: Establishing the context, Risk assessment and Risk treatment.

The Group structures its risks along two dimensions: operational and generic risks. The operational dimension is split into the following categories: innovation, operations, sales, sourcing, inventory, logistics, people, finance, ICT and legal risks. The generic dimension is split into economic, political, regulatory, climate change and reputational risks.

Tax risk management, as part of the finance and legal risks, aims at identifying and managing all material tax risks, including the assessment on the impact of these tax risks and the likeliness they will occur. Furthermore, it includes the process of either eliminating the risk or minimizing the likeliness. The tax risk management aims for the avoidance of unnecessary disputes. The Risk Management process assesses both the long- and short- term risks, and considers risks outside the direct scope of tax such as reputational risk and risk in respect of the relationship with stakeholders.

Specifically for the assessing and managing of the tax risks at the level of the UK Group, the following guiding principles are applied and communicated:

- We aim to do our Tax Compliance correctly, completely, and timely. We want to meet all legal obligations under the UK tax laws and regulations.
- We will proactively determine potential tax risks and opportunities, by systematically preparing risk mapping dashboards combining the major parameters of the tax environment in the UK and the tax specificities and tax history of the UK Group
- We will take prioritized actions to mitigate the risk and to build up strong technical positions with clear argumentation and documentation of such positions.
- We will, in line with the group Authorised Signatories List, disclose the identified risks with Deceuninck headquarters in order to give group full oversight over local tax matters, and have tax matters correctly and timely reflected also in the group IFRS accounts, next to the UK statutory accounts.

Attitude to tax planning

As a general rule, the UK Group's tax strategy follows the business strategy meaning that group structures and transactions are business- and not tax driven. In other words, the UK Group will not engage in artificial transactions to reduce UK taxes.

This being said, in case it is in line with the business strategy, transactions will be carried out in the most tax efficient way. However, compliance with the UK tax legislation is the main guiding principle – tax optimization is allowed but abusive tax schemes are not permitted.

Where the tax law is unclear or subject to interpretation, we will seek for support from external tax advisors supported by appropriate written advice, actively supported and advised by our UK and group finance and legal teams.

Level of risk in relation to UK taxation that the UK Group is prepared to accept

We do not have a formally defined level of acceptable tax risk. However, we manage our tax risks as set out above and will not enter into tax structures that are intended for tax avoidance and have no commercial or business purpose. In case of specific transactions, the transactions will also be supported by the group HQ level support and/or external advice.

The latter also ensures that all tax filing positions are supported with the appropriate documentary evidence.

Relationship with HM Revenue & Customs (HMRC)

The UK Group commits to:

- establish a collaborative professional relationship with HMRC;
- discuss tax planning, strategy, risks and significant transactions in a transparent and timely manner with HMRC;
- respond to queries and information requests in a timely fashion and keep HMRC informed of progress on responses relating to complex matters;
- work with HMRC to resolve issues in real time and before returns are filed if possible, and where disagreements arise resolve issues by agreement where possible; and be open and transparent about decision-making, governance and tax planning.