

## **Marmon Holdings, Inc. UK Tax Strategy**

This is the UK tax strategy for each UK subsidiary group, UK qualifying company, and UK permanent establishment within the Marmon group of companies.

The Vice President of Tax of Marmon Holdings, Inc. is responsible for implementation of the tax policy.

Our parent company, Berkshire Hathaway Inc., requires that we pursue a low-risk tax policy and engage with Her Majesty's Revenue & Customs ("HMRC") in an open and honest manner.

We will aim to manage our tax affairs in strict accordance with all applicable laws and regulations and the ethical standards of Marmon Holdings, Inc. and Berkshire Hathaway Inc.

We will aim to manage our tax affairs responsibly and transparently in a way that is compatible with the requirements for preserving Berkshire's previously assigned low tax risk classification under the Business Risk Review process by:

- Being open and timely with HMRC about the management of all tax compliance risk.
- Raising significant compliance issues, uncertainties and/or irregularities with HMRC as they arise.
- Promptly providing full, accurate and helpful answers to HMRC queries.
- Providing appropriate resources to deal with all tax reporting obligations.
- Maintaining clear accountability up to the Vice President of Tax for the management of tax compliance risk and tax planning.

We will strive to maintain compliance with all tax laws and legislation via a strong system of internal governance that requires well-documented internal processes and controls, using qualified and experienced personnel.

We will ensure all decisions are made at an appropriate level, with diligent professional care and judgment and supported with documentation that evidences the facts, conclusions, and risks involved. Unusual material tax items are required to be reported to the Vice President of Tax.

We will actively seek open dialogue with HMRC and provide all relevant information that is necessary for HMRC to review possible tax risks, while working collaboratively with HMRC to achieve early agreement on disputed issues whenever possible.

We will strive to ensure all tax returns and agreed tax payments are made within statutory deadlines and provide all relevant tax-related information and documents that may be requested by HMRC on a timely basis.

We will never deliberately conceal or knowingly misrepresent issues to HMRC. If we discover errors, we will disclose them as soon as reasonably practical.

All transactions must be fully justifiable and have a business purpose or commercial rationale.

We will seek to utilize certain reliefs and incentives that may exist, while showing respect for the intent, as well as the letter, of the law.

We will only adopt a tax-planning position that we believe is more likely than not to be settled in our favor after making full disclosure of relevant facts to HMRC.

We will not use artificial structures that are unrelated to Marmon's business for the sole purpose of reducing our tax burden.

External tax planning advice may be sought for:

- Large, unusual transactions;
- In respect of any business in specialist groups;
- To assist in forming an opinion on potentially uncertain positions; or
- Any overseas business ventures.

Publication of this strategy is considered as satisfying both Para 19 (2) and Para 22(2), Schedule 19 of the UK Finance Act 2016 in respect of Marmon's financial year ending December 31, 2022.