

UK Tax Strategy

OQ Trading (UK) Services Limited (the “**Company**”), a limited company registered in England and Wales, is wholly owned by OQ Trading Limited (“**OQT**”). The registered address of OQT is Level 6 & Level 7, Precinct Building 6, Dubai International Financial Centre, P.O. Box 506515, Dubai, United Arab Emirates. The ultimate controlling party of the Company is the Government of the Sultanate of Oman, held by the Oman Investment Authority.

This strategy applies to the Company in accordance with paragraph 22(2) of Schedule 19 to the Finance Act 2016 (the “**Schedule**”).

This Strategy applies from the date of publication until it is superseded. References to ‘UK Taxation’ are to the taxes and duties set out in paragraph 15(1) of the Schedule.

This Strategy is underpinned by key policies below to ensure that the Company is a responsible global corporate tax citizen.

COMMITMENT TO COMPLIANCE

The Company intends to fulfil its tax obligations in accordance with the UK’s Taxation law and practice. The Company’s commitment to compliance means that appropriate arrangements are in place to calculate accurately its UK Taxation liabilities so it can ensure payment of the right amount of tax in the right place at the right time. The Company discloses all relevant facts and circumstances to the UK tax authorities on a timely basis, while claiming available reliefs and incentives relevant to its business activities.

HOW THE COMPANY MANAGES UK TAXATION RISKS

The Company has defined policies which govern the identification and management of UK Taxation risks. These policies are in place to ensure that the Company pays the appropriate level of UK Taxation and that identified risks are reviewed at the appropriate level within the Company. UK Taxation policies and their implementation are overseen by the Company Finance team which reports directly to the OQT Chief Financial Officer. Significant UK Taxation risks are reported to the Company (and, if appropriate, OQT) Board of Directors.

THE COMPANY’S ATTITUDE TO TAX PLANNING

The Company looks to operate its business in compliance with all relevant UK Taxation laws and regulations. All UK Taxation planning considers the commercial and economic substance of a transaction while looking to make use of applicable reliefs and incentives as appropriate. The Company does not enter into transactions that have no commercial purpose or to avoid UK Taxation.

LEVEL OF RISK THE COMPANY IS PREPARED TO ACCEPT

The Company seeks to minimise tax risk as much as possible. The Company recognizes that tax legislation can be complex. When dealing with complex UK Taxation issues, it engages independent advisors to reduce uncertainty where possible. This includes the use of highly qualified third-party firms for UK transfer pricing documentation, advice on complex tax issues and general tax advice.

HOW THE COMPANY WORKS WITH HMRC

The Company recognizes the importance of working closely and constructively with HMRC. The Company pursues a positive, open and transparent relationship with HMRC to reduce the number of disputes and achieve quick resolutions on any disputes that may arise. To this end, the Company is committed to providing relevant information to HMRC on a timely basis to ensure conclusions are reached as quickly as possible.