

## **ANTI-FACILITATION OF TAX EVASION STATEMENT**

In the light of Criminal Finances Act 2017, Qioptiq Limited has adopted a statement of our corporate value on anti-facilitation of tax evasion. We are fully committed to complying with all legislation and applicable guidelines designed to prevent tax evasion and the facilitation of tax evasion in the jurisdictions in which we, our customers, our suppliers and our business partners operate.

The Company has a strong focus on corporate responsibility, and we see responsible administration and payment of taxation as a responsibility of our business. Specifically, Excelitas Group Code of Conduct reflects our commitment to honest and ethical business practices. The Code provides standards and guidelines of conduct for all Qioptiq employees, officers and directors, and for others doing business with the Company, such as customers and suppliers. Qioptiq, like all businesses that are successful over a long term, is built on a foundation of honesty and integrity. This principle has guided us throughout our history and we remain committed to it.

### **Company Tax Strategy**

The Company's overall tax strategy, applied consistently and throughout the Excelitas Group (parent), is fully endorsed by our senior management to meet all legal requirements and to make all appropriate tax returns and tax payments.

### **Risk management and governance arrangements**

Responsibility for Group tax governance and strategy lies with the Chief Financial Officer (CFO), with oversight of the Board and local transactions.

The day to day responsibility for payment of tax is delegated to the Site Controller. That individual is required to report regularly to the CFO on compliance with the tax strategy.

The Company recognizes that managing tax compliance is increasingly complex. The Company's internal structure is set up to ensure:

- The Board of Directors understands the importance of tax compliance and how it is achieved.
- There is a constant dialogue between the Board and those individuals tasked with the operation of the finance function with respect to the way the Company manages its tax risk.
- The Company portrays a positive view towards tax compliance and the importance of meeting its obligations.

Qioptiq retains external tax and statutory accounts auditors and advisers.

### **Prevention Through Vigilance**

Employees and associates of Qioptiq must not undertake any transactions which:

- (a) cause the Company to commit a tax evasion offence; or
- (b) facilitate a tax evasion offence by a third party.

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter tax evasion facilitation. At a more general level, the best defence against tax evasion and facilitation of tax evasion remains the vigilance of our employees and associates supported by our Whistleblowing procedure. All persons working for us are encouraged to report at the earliest possible stage if they believe or suspect that a conflict with our policy has occurred, or may occur in the future

At all times, Qioptiq business should be conducted in a manner such that the opportunity for, and incidence of tax evasion is prevented.