

Hamlin Electronics Europe Limited ("the Company") Tax Strategy

Introduction

This statement is made pursuant to Schedule 19 to the Finance Act 2016 and sets out Hamlin Electronics Europe's policy and approach to conducting and managing its UK tax affairs. In publishing this statement Hamlin Electronics Europe is fulfilling its obligations under the Finance Act 2016.

This statement will be periodically reviewed by management with responsibility for tax and any amendments will be approved by the Company's Board of Directors. This statement is effective for the Company's financial years commencing 1 January 2019 and will remain in effect until any amendments are approved by the Company's Board of Directors. This statement shall in any event be re-issued no later than 29 December 2020.

In this statement references to "the Company" or "Hamlin Electronics Europe" shall be references to Hamlin Electronics Europe Limited and any United Kingdom affiliates of Hamlin Electronics Europe Limited.

Tax Policy

Hamlin Electronics Europe is committed to conducting its tax affairs consistent with the following objectives:

1. to comply with all relevant laws, rules, regulations, and reporting and disclosure requirements; and
2. to apply due professional diligence and care in the management of risks associated with tax matters, and in doing so ensure that appropriate governance and assurance procedures are implemented.

Principles of Ethical Business Conduct

Hamlin Electronics Europe follows principles of ethical business conduct which all employees and officers of Hamlin Electronics Europe are expected to adhere to in all dealings and business matters, including its tax affairs. Hamlin Electronics Europe requires that all staff should act honourably, with honesty and integrity, in compliance with all applicable domestic and foreign laws and regulations, and in accordance with the highest moral/ethical standards of responsibility and accountability in all dealings with our customers, potential customers, business partners, suppliers, public officials, competitors and each other. Non adherence to this policy may constitute a disciplinary matter and could lead to disciplinary proceedings that can ultimately include dismissal.

Tax Risk Management

Responsibility and accountability for the tax affairs is the responsibility of the Company financial controller who reports directly to the Company's Board of Directors. The Company's Board of Directors also take an active role in shaping tax decisions in respect of material transactions.

Diligent professional care and judgement is employed to assess tax risks in order to arrive at reasoned conclusions on how the risks should be managed. Where there is uncertainty as to the application or interpretation of tax law, appropriate advice will be taken from third party professional advisers to support the decision-making process.

Risk management processes and systems include compliance and risk monitoring systems and internal reviews of tax compliance.

Attitudes to tax planning

Hamlin Electronics Europe believes that it should pay the amounts of tax legally due. There will, however, be circumstances where this amount may not be clearly defined, or where alternative approaches may result in differing tax outcomes. The Company will use its best judgement in determining the appropriate course of action, using available reliefs and incentives where possible. On occasions where the tax treatment of a transaction requires specialist tax knowledge the Company will seek external professional advice.

Hamlin Electronics Europe and its tax risks

The Company's strategic aim is to maintain a low UK tax risk rating. The Company seeks to achieve this aim through:

- (i) the submission of all UK tax returns on a timely basis, including sufficient detail to enable HMRC to form an accurate view of the affairs of the Company filing the return with an adequate supporting audit trail and sign-off process;
- (ii) paying the appropriate amount of tax at the right time;
- (iii) ensuring that the departments who are involved in Hamlin Electronics Europe's tax processes are adequately resourced and supported, and that key personnel are retained in order to manage tax compliance issues on a knowledgeable and timely basis; and
- (iv) ensuring that all tax filing positions are supported with appropriate documentary evidence.

Where there is a view taken by Hamlin Electronics Europe that may potentially differ to a position taken by HMRC, the Company aims to be transparent about the filing position it has taken.

Relationships with tax authorities

Hamlin Electronics Europe is committed to the principles of openness and transparency in its approach to dealing with tax authorities. All dealings with the tax authorities and other relevant bodies will be conducted in a collaborative, courteous and timely manner. The aim would be to strive for early agreement on disputed matters, and to achieve certainty wherever possible.

Signed for and on behalf of Hamlin Electronics Europe Limited

Date: 27 December 2019



E.R. van Erk
Director