Ocean Partners Holding Limited

Annual Tax Strategy

December 2017

OCEAN PARTNERS HOLDINGS LTD – ANNUAL TAX STRATEGY

Background

Ocean Partners Holdings Ltd and all of its subsidiaries ("The Company") is an international Metal Trading Group with operations in 8 countries across the world. The Parent Company is a private limited company incorporated in England & Wales.

Our tax risks

The key tax risks identified are:

- Compliance risk: The risk that tax submissions or payments due in a particular jurisdiction are not made when required.
- Transaction risk: The risk that trading activities undertaken are done so without sufficient regard to local tax regulations.
- Reputational risk: The risk to the Company arising from the wider impact of the tax strategy enacted, with respect to our suppliers, customers and other stakeholders.

Management of tax risks

While the board oversees the tax strategy as a whole, tax compliance in each country of operations is delegated to a local level where local specialists are engaged.

The Company assesses the tax liabilities due as a result of profits generated in a jurisdiction, and does not seek to reduce tax liabilities through the artificial rerouting of profit streams. The board feel that this practice of assessing tax as a result of trading, as opposed to trading as a result of tax, ensures that the risks identified above are mitigated.

As a result, the Company does not have a separate UK tax strategy.

Our attitude to tax planning

The board does not advocate aggressive tax planning and tax is paid where it falls due. Turnover is high due to the nature of the business but the Company considers the underlying business to be more akin to a smaller organisation. The Company's staff numbers reflect this and it retains no specialist tax employees within the organisation. External advice may be sought on an ad hoc basis on a range of matters, in particular for areas of complexity, to ensure it meets filing obligations and other tax requirements. Furthermore, the Company does not have significant subsidiaries placed in ultra-low tax jurisdictions.

The Company would expect all employees to adhere to the relevant tax laws it is subject to and act within the spirit in which they were intended.

The level of risk in relation to UK taxation that we are prepared to accept.

Elimination of tax risk entirely is not feasible but the Company's aim is to keep the UK tax risk as low as possible. This is to be done by:

- Submitting all UK tax returns on time and have filing positions supported by appropriate evidence;
- Paying the correct amount of tax on time;
- Being transparent with HMRC in its dealings, in particular if the Company takes a different view to HMRC on a tax position;
- Ensuring tax accounting arrangements to comply with the Senior Accounting Officer (SAO) provisions.

Working with HMRC

The Company has a good relationship relationship with HM Revenue & Customs, and has consistently been assessed as low risk. The board are proud of this and they endeavour to maintain this assessment through the policies outlined above.

The Company regards the publication of this tax strategy as complying with the duty under paragraph 16(2) of Schedule 19 of the Finance Act 2016 to publish the Company's tax strategy in the current financial year.

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