

KAMAN UK HOLDINGS LIMITED 2018 TAX STRATEGY

In compliance with section 16(1) and section 19(2) of schedule 19 Finance Act 2016, the company is publishing its tax strategy for the year ending 31 December 2018. As the head company of the UK sub-group, we confirm that this strategy will apply to the following UK companies:

- Kaman Composites – UK Holdings Limited;
- Brookhouse Group Holdings Limited;
- Brookhouse 2004 Ltd.;
- Kaman Composites – UK Limited;
- Kaman Fabricated Products Limited;
- Kaman Tooling Limited;
- Brookhouse IM Limited;
- Brookhouse (SPD) Tool Company; and
- Brookhouse Automotive Ltd.

Our business has a strong focus on corporate responsibility, and we see responsible administration and payment of taxation as a responsibility of our business.

Our overall tax strategy is to:

- Meet all legal requirements and to timely and accurately file all appropriate tax returns and make all required tax payments.
- Seek to utilise available tax reliefs and incentives where available in a manner which is consistent with the government's policy objectives.
- Consider the tax impact in major or complex business decisions, for example acquisitions.
- Operate in an environment where we consider tax in the context of our reputation and brand.
- Comply with appropriate tax risk processes, and ensure there is Board oversight into this compliance.

Risk management and governance arrangements

We want our tax affairs to be transparent and compliant with tax legislation, and recognise that managing tax compliance is increasingly complex. Our internal structure is set up to ensure:

- The Board of Directors understand 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 our finance function, regarding the way our business manages its tax risk.
- The business portrays a positive view towards tax compliance and the importance of meeting our obligations.

We keep under review how we meet our tax obligations, by seeking external tax advice, investing in tax training for our staff and also how we manage our relationship with tax authorities.

Tax planning

We do not undertake aggressive tax planning. We have a responsibility to minimise our tax risk and our exposure to negative publicity through non-compliance. Professional advice is sought on a transactional basis, with the depth of such advice being driven by our assessment of the risk presented by each opportunity.

Attitude towards risk

The Board sees compliance with tax legislation as key to managing our tax risk. We understand the importance of tax in the wider context of business decisions and have processes in place to ensure tax is considered as part of our decision making process.

We have relationships with professional advisers that allow us to seek expert advice on specialist areas of tax. Our approach is to ensure we are compliant and understand our responsibilities with regards to tax, rather than looking for ways to aggressively avoid payment of tax.

The group prides itself on maintaining a strong brand reputation and will not undertake aggressive tax planning which could damage this reputation. The Board sees strong internal processes and a good relationship with our professional advisors as the best way to manage this reputational risk.

Relationship with HM Revenue & Customs (HMRC)

Our communication with HMRC is focused around timely tax compliance, for example meeting relevant filing and payment deadlines for taxes the company pays.

We employ the services of professional tax advisers to act as our agents, and in a number of cases they liaise with HMRC on our behalf. This is seen by the Board as a way to ensure we get the most out of our relationship with HMRC, thus reducing our tax risk.