

## **Innocean Worldwide UK Limited Tax Strategy**

### **Scope**

#### **Introduction to Group structure**

This strategy applies to Innocean Worldwide UK Limited in accordance with Part 2 of Schedule 19 to the Finance Act 2016. Innocean Worldwide UK Limited is the only UK Company that is part of the wider Innocean Worldwide Inc. (a South Korean resident company) group. Accordingly, this strategy only applies to Innocean Worldwide UK Limited. In this strategy, references to 'the firm' or 'the Company' are to Innocean Worldwide UK Limited. The strategy has is being published in accordance with paragraph 16(4) of 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This strategy applies from the date of publication until it is superseded.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 which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Land Tax. References to 'tax', 'taxes' or 'taxation' are to UK taxation and to all corresponding worldwide taxes and similar duties in respect of which the Company has legal responsibilities.

#### **Aim**

Innocean Worldwide UK Limited is committed to full compliance with all statutory obligations and full disclosure to relevant tax authorities. The group's tax affairs are managed in a way which takes into account the group's wider corporate reputation in line with Innocean Worldwide UK Limited's overall high standards of governance.

#### **Governance in relation to UK taxation**

- Ultimate responsibility for Innocean Worldwide Limited's tax strategy and compliance rests with the Board of Innocean Worldwide Inc.;
- Executive management of the Company is delegated by the Board to Hyun Woo Sim;
- The Chief Financial Officer ('CFO') is the Board member with executive responsibility for tax matters;
- Day-to-day management of Innocean Worldwide Limited's tax affairs is delegated to the Corporate Services Director (Emily Kim), who reports to the CFO;
- The Corporate Services team is staffed with appropriately qualified individuals;
- The Board ensures that Innocean Worldwide Limited's tax strategy is one of the factors considered in all investments and significant business decisions taken;
- The Corporate Services Director reports directly to the CFO on Innocean Worldwide Limited's tax affairs and risks during the year.

#### **Risk Management**

- Innocean Worldwide UK Limited operates a system of tax risk assessment and controls as a component of the overall internal control framework applicable to the group's financial reporting system;
- Innocean Worldwide UK Limited seeks to reduce the level of tax risk arising from its operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations;
- Processes relating to different taxes are allocated to appropriate process owners, who carry out a review of activities and processes to identify key risks and mitigating controls in place. These

key risks are monitored for business and legislative changes which may impact them and changes to processes or controls are made when required;

- Appropriate training is carried out for staff outside the Corporate Services team who manage or process matters which have tax implications;
- Advice is sought from external advisers where appropriate.

### **Attitude towards tax planning and level of risk**

Innocean Worldwide UK Limited manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax.

When entering into commercial transactions, Innocean Worldwide UK Limited seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation. Innocean Worldwide UK Limited does not undertake tax planning unrelated to such commercial transactions.

The level of risk which Innocean Worldwide UK Limited accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the group's tax affairs. At all times Innocean Worldwide UK Limited seeks to comply fully with its regulatory and other obligations and to act in a way which upholds its reputation as a responsible corporate citizen. In relation to any specific issue or transaction, the Board is ultimately responsible for identifying the risks, including tax risks, which need to be addressed and for determining what actions should be taken to manage those risks, having regard to the materiality of the amounts and obligations in question.

### **Relationship with HMRC**

Innocean Worldwide UK Limited seeks to have a transparent and constructive relationship with HMRC during communications in respect of developments in Innocean Worldwide Limited's business, current, future and retrospective tax risks, and interpretation of the law in relation to all relevant taxes.

Innocean Worldwide UK Limited ensures that HMRC is kept aware of significant transactions and changes in the business and seeks to discuss any tax issues arising at an early stage. When submitting tax computations and returns to HMRC, Innocean Worldwide UK Limited discloses all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain.

Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.