

UK TAX STRATEGY

INTRODUCTION

This document is approved by the boards of the following entities included in this tax strategy document, being:

- Tower Research Capital Europe Limited;
- TRC Networks (UK establishment of TRC Systems LLC); and
- UK establishment of Tower Research Capital Europe BV.

The above three entities are referenced collectively as the 'UK Group'. There is no statutory UK Group in existence with the above entities all standalone UK establishments that are members of a larger group headquartered in the U.S. (the 'Tower Group').

The UK tax strategy applies for the year ended 31 December 2023, and will be reviewed annually. The UK Group regards the publication of this UK tax strategy as complying with its duty under the Finance Act 2016, Schedule 19, paragraph 16(2). The UK tax strategy applies for the financial year ended 31 December 2023 and will be reviewed annually. References to 'UK Tax' are to the taxes and duties set out in Finance Act 2016, Schedule 19, paragraph 15(1) which include Income Tax, Corporation Tax, PAYE, NIC, and VAT. References to 'tax', 'taxes' or 'taxation' are to UK tax and to all corresponding worldwide taxes and similar duties in respect of which the UK Group has legal responsibilities.

Transparency, fairness, collaboration and excellence are key to our culture and risk governance. We aim to comply with both the letter and the spirit of the law.

RISK MANAGEMENT AND GOVERNANCE ARRANGEMENTS

Ultimate responsibility for the UK Group's UK tax strategy, the supporting governance framework and management of tax risk remains with the Boards of Directors of the entities making up this UK Group. Day to day UK tax risk is overseen by senior members of the relevant UK Group entities' finance teams and the Tower Group global head of tax. The tax strategy aligns to the UK Group's wider risk and control framework. On an annual basis, a risk and control assessment is carried out, led by the risk department with key tax risks and control mitigants considered.

The UK Group routinely engages with external advisers to aid in the interpretation of tax laws and practices and where any particular tax risk or complexity has been identified. As needed, the UK Group looks to engage with tax authorities to disclose and resolve issues, risks and uncertain tax positions. As a result, at any given time, the UK Group may be exposed to financial and reputational risks arising from its tax affairs although the tax risk management procedures in place mean that these risks are carefully controlled.

TAX PLANNING

The UK Group works to ensure profits are aligned to the jurisdictions where functions are performed, assets are employed and risks are borne and looks to pay the appropriate amount of tax in each jurisdiction in which it operates. However, in supporting genuine commercial activity, the UK Group looks to structure its affairs in a tax efficient manner and utilise tax incentives.

LEVEL OF RISK IN RELATION TO UK TAX THAT THE UK GROUP IS PREPARED TO ACCEPT

The UK Group has a low UK tax risk tolerance. Integrity is at the core of what we do, we do not tolerate tax evasion, nor do we tolerate the facilitation of tax evasion by any person(s) on the UK Group's behalf.

RELATIONSHIP WITH HMRC

We intend to continue to engage with HMRC on a regular basis and make voluntary disclosures to HMRC that we feel are in-line with our tax governance framework. We believe in working transparently and collaboratively with HMRC and to maintain a strong working relationship together.