

Scope

This strategy applies to:

Werner International Holding, Ltd.
Werner U.S. Holding, Ltd.
Werner Access Products UK Holdings, Ltd.
Werner UK Sales & Distribution, Ltd.
Youngman Group Ltd.
Werner UK Operations, Ltd.
Haemmerlin Ltd., and
Bescot Construction Tools Ltd.

(hereinafter referred to as the 'UK Subs'). This strategy has been published in accordance with paragraph 16(4) of Schedule 19 to the Finance Act 2016.

The UK Subs manufacture and distribute various products in the climbing or access category, as well as other products in the light industrial category. These products are sold into the professional and consumer (DIY) channels of trade in the United Kingdom and elsewhere. These are not regulated activities.

This strategy applies for the period ending 31 December 2019. 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 UK Subs have legal responsibilities.

Aim

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

Governance in relation to UK taxation

- Ultimate responsibility for UK Subs' tax strategy and compliance rests with the Boards of UK Subs;

- Executive management of the group is delegated by the Boards to the Chief Financial Officer ('CFO');
- The Chief Financial Officer ('CFO') is the Board member with executive responsibility for tax matters;
- The Finance and Tax teams are staffed with appropriately qualified individuals;
- The Boards ensure that UK Subs' tax strategy is one of the factors considered in all investments and significant business decisions taken;

Risk Management

- UK Subs operate 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;
- UK Subs seek to reduce the level of tax risk arising from their 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 their 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 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

UK Subs manage risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax.

When entering into commercial transactions, UK Subs seek to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation. UK Subs do not undertake tax planning unrelated to such commercial transactions.

The level of risk which UK Subs accept in relation to UK taxation is consistent with their overall objective of achieving robustness in the group's tax affairs. At all times UK Subs seek to comply fully with their regulatory and other obligations and to act in a way which upholds their reputation as responsible corporate citizens. In relation to any specific issue or transaction, the Boards are 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.

All employees of the UK Subs are subject to their Code of Business Conduct, which includes among its requirements: “honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company provides to its investors, lenders and other interested parties, and in other public communications made by the Company; and compliance with applicable governmental laws, rules and regulations.”

Relationship with HMRC

UK Subs seek to have a transparent relationship with HMRC ensuring that relevant information in respect of developments in UK Subs’ business, current, future and retrospective tax risks, and interpretation of the law in relation to all relevant taxes are made available as and when required.

UK Subs ensure that HMRC is kept aware of significant transactions and changes in the business. When submitting tax computations and returns to HMRC, UK Subs disclose all relevant facts and identify any transactions or issues where they consider 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.