Secure Group Tax Strategy

This document, along with our underlying operational procedures in relation to Secure's tax affairs, sets out approach to conducting its tax affairs and dealing with tax risks as required under the law.

The Secure Group comprises of all the legal entities operating in various jurisdiction across the Globe.

Secure is committed to:

• complying with all applicable laws and regulations relating to its tax activities;
• maintaining an open and honest relationship with the Tax authorities; and
• ensuring the tax strategy is, at all times, consistent with its core values.

The specific core values that are relevant to Secure's tax affairs are:

- Trust;
- Fairness; and
- Respect.

Secure's core value of Trust means we do what we say we will do. This strategy is an example of setting out what we do.

Risk Management and governance

Secure's aim is to be a compliant taxpayer who takes a low-risk approach to tax. This means keeping the tax affairs as simple as possible to ensure that the correct amount of tax is paid.

To seek professional advice on the tax treatment of specific issues to ensure compliance with applicable laws, rules, regulations and reporting and disclosure requirements consistent with Secure's low risk approach to tax.

Risk the group is prepared to accept

Secure take a low-risk approach to tax and the business is structured based on sound commercial rationale, Group's core values, and relevant tax legislation. For aggressive tax planning prior external advice will be sought, where appropriate.

Tax Planning

Secure's core value of Fairness means to pay the correct amount of tax and aggressive tax planning is not undertaken. When making any decision, commercial rationale will always be the basis of our actions rather than specific tax reduction and we will not act in a way that knowingly contradicts the intent of legislation.

Secure will use Government approved incentives and reliefs to minimise the tax costs of conducting our business activities but will not use them for purposes which are knowingly contradictory to the intent of the legislation.

Dealings with Tax authorities

Secure's core value of Respect means we aim to operate in all our dealings with Tax authorities with respect based on honesty and integrity.

Secure is committed to the principles of openness and transparency in its approach to dealing with Tax authorities and in particular will:

- make fair, accurate and timely disclosure in correspondence and returns, and respond to queries and information requests in a timely fashion;
- where uncertainties arise in relation to tax, will seek clearances from Tax authorities;
- seek to resolve issues with Tax authorities in a timely manner, and where disagreements arise work with Tax authorities to resolve issues by agreement where possible; and
- be open and transparent about decision-making, governance and tax planning on a real time basis.