

## **Kingston UK Tax Strategy (2024, 2025)**

This document is intended to comply with the duty to publish the tax strategy of those Kingston group entities incorporated or operating in the UK as required by Section 161 and Schedule 19 of the Finance Act 2016 (as amended) for the financial year from 1 January 2024 to 31 December 2024 and the intention for the forthcoming financial year from 1 January 2025 to 31 December 2025.

### **Scope**

This tax strategy applies to all UK limited liability partnerships and UK companies within the Kingston MNE Group. The partnerships and companies below regard the publication of this document as complying with the duty under paragraph 22(2) of Schedule 19 in the current financial year.

#### **Active companies**

Kingston Technology Europe Co LLP  
Kingston Digital Europe Co LLP

All these entities are referred to collectively in this document as the Kingston UK Group. This strategy applies to the types of UK taxation listed in s15(1) Schedule 19 of the Finance Act 2016.

### **Overview**

Our UK tax strategy is ultimately owned by the Board of our parent with operational responsibility delegated to the UK management board, who also provide relevant input based on local knowledge. Accordingly, both our main board and the UK management board are collectively responsible for setting our tax objectives and guiding principles. These are:

- to seek to comply with all applicable tax laws and regulations;
- to take a low risk approach to our tax affairs;
- to adopt an open, honest and professional approach in our dealings with HMRC;
- if the circumstances arise seek to resolve any potential differences of view with HMRC by working collaboratively with them.

### **Kingston UK Group approach to risk management and governance arrangements in relation to UK Taxation.**

The UK strategy is the responsibility of the directors, management board members and other senior staff in the UK entities. Senior management with board oversight is responsible for our internal tax controls which comprise the following elements:

#### ***Control environment***

We have established reporting lines and appropriate delegated authorities and responsibilities to ensure clear accountability and communication of relevant information; competent and qualified individuals with relevant skills and expertise (supplemented by external advisers where necessary) and accountability for tax responsibilities.

### *Identification of tax risks*

We identify the tax risks which could apply to our business based on the business transactions undertaken. This is essentially those transactions which are required by tax law to be treated in a specific way for tax purposes.

### *Managing tax risks identified*

Through a combination of appropriately qualified personnel (supplemented by external advisers where necessary) end to end processes and systems the tax risk identified is managed to ensure the correct tax treatment in order to meet the company's primary tax objective of compliance with all tax laws.

### *Information and communication*

Management ensures that the necessary information to support accurate tax filings is available and effectively communicated both internally and externally to ensure tax obligations are met.

### *Monitoring activity*

Ongoing checks are made of our financial and tax processes and procedures with assistance from our external auditors to ensure that staff responsible for processing transactions perform their functions correctly and diligently.

Our advisers also provide oversight and assurance as part of our periodic updates with them where we share details of any business developments, and they provide input on tax law developments in order to identify any new risks which could emerge.

### **Kingston UK Group attitude towards tax planning so far as affecting UK taxation**

Our approach to tax planning is to make use of any available tax reliefs which are intended to apply to the commercial transactions we undertake, in a manner which is consistent with our desire to maintain a low risk approach to our tax affairs.

### **Kingston UK Group level of risk in relation to UK taxation that the group is prepared to accept.**

We aim to apply the law correctly to all our transactions and thereby aim to minimise tax risk. We recognise that tax legislation can be complex and subject to interpretation, consequently appropriate independent advice is taken if needed to reduce any potential uncertainty as far as possible. Should significant uncertainty remain after taking independent advice, we would, if recommended by our advisers, seek to clarify the position with HMRC.

### **Kingston UK Group approach towards its dealings with HMRC**

The Kingston UK group is committed to maintaining an open honest and professional relationship with HMRC based on collaboration and integrity.

We seek to resolve issues with HMRC in a timely manner, and should disagreements arise work with HMRC to resolve issues collaboratively by agreement where possible.

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