

TAX STRATEGY OF V-TRAK LTD

AUGUST 2024

SECTION 1: INTRODUCTION

1.1 Background

Permobil is a world leader in developing, manufacturing and marketing power wheelchairs, manual wheelchairs, seating and positioning products and communication systems for people with disabilities. Permobil has subsidiaries in numerous countries and its products can be found in 70 countries. The headquarters are in Timrå, Sweden, and the group is ultimately owned and controlled by Investor AB, a Swedish listed company holding stakes in a diverse range of businesses.

The UK market is the tenth largest within Permobil's world-wide activities, and part of the UK operations are conducted in V-Trak Limited.

This document sets out the strategic tax objectives of Permobil Limited and satisfies the UK requirement to publish its tax strategy under Schedule 19 of the Finance Act 2016.

1.2 Ownership and approval

The Tax Strategy is approved by the Board of Directors of V-Trak Limited.

The Group Tax Director within Permobil Group is responsible for leading the Tax Strategy, together with the Vice President of Group Finance.

The Tax Strategy will be periodically reviewed, and any amendments will be approved by the Board of Directors.

The appointed Country Officer is ensuring that the Tax Strategy is upheld on a daily basis.

1.3 Scope

V-Trak Ltd's operations is exposed to a wide range of taxes, including corporation tax, VAT, insurance premium tax and national insurance contributions. In addition, the UK operations has around 13 employees, generating a substantial further tax contribution to the economy through PAYE and NIC.

SECTION 2: TAX STRATEGY

2.1 Summary

V-Trak Limited is committed to paying the correct amount of tax required under the laws and regulations of UK tax legislation and practice. V-Trak Limited takes a conservative approach to tax planning and does not pursue aggressive tax planning arrangements.

V-Trak Limited uses third party advisors to provide advice and guidance to help assess the tax risks and ensure its compliance with applicable laws, rules, regulations and disclosure requirements.

2.2 Risk Management

It is the policy of the V-Trak Limited to ensure that all tax positions taken are consistent with the core values of the group, which notably include respect for the environment and respect for people and communities. The policy ensures that the V-Trak Limited pays the appropriate amount of tax in relation to its commercial activities.

The main tax risks for the V-Trak Limited are identified as:

- **2.2.1 Tax compliance and reporting risks.** These risks are associated with the failure to comply with the tax regulations of the appropriate authorities within each market V-Trak Limited operates. The risk is reduced by using external professional advisers to prepare, advise and review tax computations and submissions.
- **2.2.2 Transactional risks.** As the V-Trak Limited operates across several markets with associated complex tax issues, advice is always taken from professional advisers when new distribution channels are established, or current transactions amended, to ensure adherence to the correct rates and treatment of tax.
- **2.2.3 Reputational risks.** V-Trak Limited ensures they are open and transparent with every governing entity in every market, although it will be primarily with the HMRC in the UK. The V-Trak Limited has a conservative approach to tax planning and aims to have open communications with all tax authorities.

2.3 Documented Policies and Procedures.

The V-Trak Limited will comply with documented policies and procedures in relation to tax risk management and will conduct risk assessments before entering any new initiatives. Where

appropriate, this will include obtaining external professional opinions to verify and support the V-Trak Limited tax management team's conclusions.

2.4 Tax Planning

V-Trak Limited strives to maintain a low risk rating with HMRC.

Whilst seeking to be efficient in the tax affairs and reduce the tax liability through taking of reliefs and incentives where applicable, V-Trak Limited ensures that any tax planning is based on sound commercial principles but will show respect at all times for the intention and spirit of the law, as well as the letter of the law.

2.5 Relationship with HMRC and other tax authorities

V-Trak Limited seeks to build and sustain honest, transparent relationships with HMRC and other tax authorities that are constructive and based on mutual respect, avoiding unnecessary delays and disputes wherever possible.

SECTION 3: GOVERNANCE

3.1 Internal ownership and structure

The Group Tax Director implements the world-wide group tax strategy, which includes the V-Trak Limited tax strategy. The Group Tax Director reports to the Vice President for Group Finance. The Tax Strategy is approved by the Board of Directors.

The Country Officer for the UK is responsible for ensuring the day-to-day compliance with the Tax Strategy.

3.2 External Consultants

For matters where the Vice President Group Finance and the Finance team for EMEA consider they have insufficient skill or experience, external expert consultants who have suitable knowledge of the Permobil Group, the industry and tax law are engaged to provide advice and guidance.