



Apto DC Limited Tax Strategy

Change control

Revision	Date	Author	Classification	Description
1.0	13 December 2024	David West	External	Approved
2.0	15 December 2025	David West	External	Reviewed and Approved

Approvals

Name/Role	Signature/reason
Geoff White on behalf of the board	Approved on 29 December 2025

In accordance with UK law and the requirements of Schedule 19 of the Finance Act 2016, Apto DC Limited has published its UK Tax Strategy below. This UK Tax Strategy has been approved by

the Board of Directors and applies for the financial year ended 31 December 2025 and subsequent financial years.

APTO DC Ltd - 2025 Tax Strategy

Apto DC Ltd is committed to conducting its tax affairs in a manner that is consistent with the values of integrity, transparency, and compliance with all applicable laws and regulations. The Tax Strategy contributes to the purpose of creating sustainable value by minimising any negative operational impacts of tax-related decisions and avoiding the risk of reputational damage. This document outlines our approach to tax strategy, governance, and risk management.

The objectives of the tax strategy are:

- Ensure all statutory obligations are met to pay the right amount of tax at the right time in the right country;
- to fulfil all of the compliance and disclosure requirements in a responsible way;
- to ensure all the tax filings in all jurisdictions are compliant and filed on a timely basis and, where applicable,
- the tax strategy ensures that any tax planning undertaken is for bona fide commercial reasons in a tax efficient manner, that should not be considered contrived, artificial or without substance
- to engage internal or external expertise as deemed necessary wherever there is sufficient clear material uncertainty as to the correct application of tax law;
- to ensure all of the systems are adequately robust and compliant in order to support the tax strategy;

Approach to managing UK Tax risks

Apto DC Ltd has a robust framework for managing tax risks, which is integrated into our overall risk management and governance processes. The Board of Directors has ultimate responsibility for tax governance and is supported by the Chief Financial Officer (CFO). Regular updates on tax matters are provided to the Board to ensure they are fully informed of the company's tax position and any potential risks.

Attitude Towards Tax Planning

Our approach to tax planning is to ensure that all transactions are aligned with our commercial and economic activities. We do not engage in aggressive tax planning or artificial arrangements that lack economic substance. All tax planning activities are undertaken with a clear understanding of the associated risks and are subject to rigorous review and approval processes.

Apto maintains a zero-tolerance approach towards any form of tax evasion or the facilitation of tax evasion by employees or any of its third party relationships.

Apto is committed to achieving good ethical business and trading standards by having robust policies and procedures designed to prevent the facilitation of tax evasion.

Level of Risk in Relation to UK Taxation

Apto DC Ltd adopts a conservative approach to tax risk. We aim to minimize tax risks by ensuring compliance with all relevant tax laws and regulations. Where there is uncertainty or complexity in the application of tax laws, we seek external advice to ensure that our tax positions are robust and defensible.

Approach Towards Dealings with HM Revenue & Customs (HMRC)

We maintain an open, proactive and transparent relationship with HMRC. We are committed to timely and accurate tax filings and payments, and we will proactively disclose any significant tax risks or uncertainties to HMRC.

Tax Risk Management Framework

Our tax risk management framework includes the following key elements:

- **Due Diligence:** We conduct thorough due diligence on all significant transactions to identify and mitigate any potential tax risks.
- **Training and Awareness:** We provide regular training to relevant employees on tax compliance and risk management to ensure they are aware of their responsibilities.
- **Internal Controls:** We have established robust internal controls to ensure the accuracy and completeness of our tax filings and payments.
- **External Advice:** We seek external advice on complex tax matters to ensure that our tax positions are compliant with all relevant laws and regulations.

Publication and Review

This tax strategy is approved by the Board of Directors and will be reviewed annually to ensure it remains up-to-date and relevant. The strategy will be published on our company website and made available to all stakeholders.

