

Tax Strategy of NBK Overseas Group

This document sets out the strategy of the NBK Overseas group ('the Overseas Group'), a subsidiary of National Bank of Kuwait SAKP, for conducting its tax affairs and managing its tax risk. The Overseas Group contains:

- NBK Overseas (London) Limited ('NBK Overseas'): a UK registered holding company solely for NBK (London) Nominees Limited ('NBK Nominees');
- NBK Nominees: a UK registered nominee company acting for non-resident investors who invest in offshore managed funds

Together defined as 'the Members'.

Approach to risk management and governance arrangements in relation to UK taxation

The Overseas Group is fully committed to complying with all UK tax law and pays the required UK taxes, namely corporation tax and indirect taxes and employment taxes if applicable. The Overseas Group aims to pay all taxes due and file all relevant tax compliance returns and documents due by the Members accurately and in a timely manner.

The policy of the Overseas Group is to comply with all relevant rules, regulations and disclosure requirements as prescribed by HMRC. Tax is an integral part of the Finance function and the overall responsibilities for tax matters are clearly defined. The UK tax compliance process is managed by the Chief Financial Officer of the UK operations of the National Bank of Kuwait SAKP, and oversight of tax matters for the Members is provided by the Board of the relevant entity. When required, professional advice would be sought over items where the tax treatment is uncertain and in relation to any changes to the legislation which impacts the Overseas Group.

Outlook towards UK tax planning

The Overseas Group is committed to acting with integrity and transparency in all tax matters. The Members of the Overseas Group always seek to carry out any transactions on favourable commercial terms and are risk averse. The Overseas Group does not actively undertake any artificial UK tax planning arrangements for which the only purpose is to reduce its liabilities with HMRC.

The Overseas Group seeks to utilise UK tax reliefs and incentives, where available, to obtain tax efficiencies within. These are utilised in a manner which is consistent with the government objective for the relief.

Level of risk in relation to UK taxation

The Overseas Group understands the importance of UK tax compliance and there is a clear understanding within the Finance function to ensure tax risk is managed appropriately.

The Overseas Group does not actively seek out high risk projects and considers its approach to tax risks to be conservative. There is no intention for the Overseas Group to increase its appetite for risk in the immediate future. UK tax matters are discussed with and overseen by professional advisers, which ensures that the risk in respect of non-compliance for UK taxation is low.

Approach towards dealings with HMRC

Given the nature of the Overseas Group's activities and size, its relationships with HMRC is compliance focused. The Members of the Overseas Group ensure that, where necessary, they provide sufficient and appropriate documentation or disclosure as additionally requested by HMRC to support all ongoing operations.

Professional services firms act as tax advisors for the Members' tax arrangements, which ensures compliance matters are dealt with in a timely and correct manner and in line with all UK tax legislation. Where relevant, the tax advisors communicate with HMRC on behalf of the Members, which aids in the management of risk and ensures any evolving UK tax issues are flagged to Overseas Group as and when they arise.

Should any issues arise, the Overseas Group would seek to resolve these through transparent and open discussions and would work with HMRC to resolve any issues in a timely manner.

This tax strategy is published in accordance with paragraph 19 (2) "*UK sub-groups: duty to publish a sub-group tax strategy*"; Schedule 19 of the Finance Act 2016. The document relates to the year ended 31 December 2024.