



LEONARDO UK LTD – TAX STRATEGY

Introduction:

Operating alongside Governments and Institutions, citizens and communities, Armed Forces and Intelligence Agencies, Leonardo UK Ltd designs and supplies a wide range of products, systems, services and integrated solutions to respond to defence, protection and security needs in many possible scenarios: air and land, naval and maritime, space and cyberspace.

We are committed to complying with tax laws in a responsible manner and our approach to tax is reinforced more generally by the Group's Charter of Values and Code of Ethics.

Our commitment to preventing the facilitation of tax evasion:

We have a zero tolerance policy on tax evasion, and are committed to preventing associated persons from engaging in tax evasion, or the facilitation thereof in accordance with the Criminal Finances Act 2017, through a suite of controls integrated into our business processes. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships, wherever we operate in the world and in particular implementing and enforcing effective systems to counter tax evasion, and other financial crimes.

How we manage tax risks:

Tax risks are managed in the same way as any other business or financial risk and are incorporated in a wider risk management system as part of our internal control processes. This includes hiring and developing suitably qualified staff in our tax teams. As part of an Italian Listed Group, these overall control processes are reviewed according to the statutory requirements of Italian Law 262/2005.

Our attitude and approach to tax planning:

Tax planning is an extension of our routine business activities as it relates to normal commercial and economic activity. We do not engage in artificial tax arrangements or schemes where the sole or main purpose is a beneficial tax outcome. Where they exist then we may take advantage of tax incentives and exemptions implemented by governments and fiscal authorities, always seeking to implement them in the manner intended.

We conduct transactions between Leonardo Group Companies on an arms-length basis and in accordance with current OECD principles.

Our appetite for tax risk:

We seek to pay the correct amount of tax according to the business activities undertaken within the territories in which we operate.

Where the wording of the law is subject to interpretation and the amounts of tax are material, we work with well-known, reputable, professional advisors, to ensure that the tax outcome is as intended by the relevant statutory body. Our aim in relation to tax risk is to achieve early certainty as to the outcome rather than engaging in prolonged tax disputes with their inherent uncertainty.

Our approach to working with HM Revenue & Customs:

We proactively engage with HMRC, largely through our Customer Compliance Manager and team, seeking to build a transparent, sustainable relationship based upon mutual trust. We aim to meet with HMRC on a regular basis and work collaboratively wherever possible to resolve disputes and to achieve early agreement and certainty.



Governance:

Our Finance Director owns and implements our approach to tax, is responsible for ensuring that tax is resourced and managed appropriately, and reports to the Board of Directors.

This tax strategy document satisfies the requirements in Schedule 19 of the UK Finance Act 2016, in respect of our financial year ending 31 December 2023.

Version: December 2023