

Introduction

We are a leading manufacturer and seller of copper telecom and rail cable and we currently export to 15 countries across the world. Our business activities incur variety of taxes, including corporation tax, business rates, employer's national insurance, we collect and pay employment taxes and indirect taxes such as VAT.

We regard the publication of the information set out below as complying with the duty under Finance Act 2016, Schedule 19, para 16 (duty to publish a tax strategy) in the current financial year.

Our Tax Principles

How we approach our tax obligations is governed by our tax principles. These principles are aligned with our values, which guide every action and every decision we take in our business, and are as follows:

- We pay the right amount of tax in accordance with the tax laws in all of the territories in which we sell into and buy from.
- Tax is considered in all significant business decisions but we do not undertake any transactions for the sole purpose of realising tax savings.
- We work in a collaborative, open and transparent manner with the tax authorities and seek to achieve early agreement of our tax position.

The principles outlined above are reviewed on an annual basis by the Board and our adherence to them is monitored by the Finance Director.

Risk Management & Governance

The ultimate responsibility for the tax strategy lies with the Board of Directors.

Directors have a duty to ensure that risk is managed and that appropriate controls and procedures are in place. Directors have appointed a Finance Director who is responsible for the day to day management of local tax obligations.

BCC is committed to meeting its legal and regulatory requirements, including filing applicable tax returns and making required tax payments when legally due. The Finance Director who has oversight of the UK company is based in the UK. He communicates as and when needed, for example, if any significant tax related matters arise.

Attitude of BCC towards tax planning (so far as affecting UK taxation)

BCC adopts a prudent approach to tax planning whilst at the same time, supporting the strategy and operations of the business.

In doing so, we at BCC are committed to fulfilling our legal obligations therefore adhering to tax laws in the territories in which we operate.

In the event of complexity and uncertainty we at BCC seek advice from our external tax advisors to ensure we remain compliant.

The level of risk in relation to UK taxation that BCC is prepared to accept

At BCC we consider that we have a low tolerance for tax risk and we seek to minimise the risk of uncertainty and tax disputes.

We aim to minimise risk and actively seek to comply with all applicable laws and regulations. Our management and approach are designed to help maintain a low level of risk and support our core values. The Finance Director actively and continuously identifies and monitors tax risks so they remain aligned to the operational and strategic objectives. If any risks are identified, the Finance Director is supported by external tax experts and/or external advisors to manage these appropriately.

Our approach to dealings with HMRC

We seek to ensure that our engagement with HMRC is professional, open and honest, and undertaken in a spirit of cooperation. We work collaboratively and respond to information requests in a timely manner. We are committed to making accurate disclosures in all our tax related filings, submissions and correspondence with HMRC. Where needed, we look to discuss and disclose any matters that arise directly with HMRC and seek resolution with HMRC in as efficient a manner as possible.

22 October 2019