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# TMS International

## 2017 UK Tax Strategy

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In compliance with section 161 and section 19(2) of schedule 19 Finance Act 2016, the company is publishing its tax strategy for the year ending 31 December 2017, which has been approved by the Board.

We confirm that this strategy will apply to the following UK companies:

- TMS International Services UK Limited
- Hanson Resource Management Limited

### **Integrity in Everything We Do**

At TMS International we have an exemplary reputation for doing business with integrity and according to the highest ethical standards. Integrity is ingrained in every aspect of our business culture. From administrative offices to our on-site facilities, our word is our guarantee.

We also take seriously the requirement that every employee comply with all applicable laws and regulations as well as our ethical code of conduct and conflict of interest policies.

### **Overall Strategy**

Tax Strategy applies to all UK taxes applicable to the UK companies and the document is owned by the Board of Directors. References to “UK taxation” are to the taxes and duties as set out in Schedule 19 which includes Income Tax, Corporation Tax, PAYE, NIC and VAT. The document will be reviewed annually, updated as appropriate and approved by the Board.

### **Risk Management and Governance Arrangements**

TMS International is committed to compliance with tax law and practice in the UK. Compliance means paying the right amount of tax in the right place at the right time. It involves disclosing all relevant facts and circumstances to the tax authorities and claiming reliefs and incentives where applicable.

A dedicated tax team, based at our US Head Office will collaborate with the UK Group’s local finance team to provide advice and guidance, where necessary. The UK companies also engage the services of a local tax advisory service who complete and file the annual Corporation Tax Returns and provide advice as required in all other aspects of tax. Dedicated IT systems are used at a transaction level to automate as much of the tax processing as possible, duties segregated and an elevated level of monthly review both locally and by the international finance and tax team.

There are clear responsibilities which are subject to regular monitoring and review by members of Group Tax who have the necessary experience and skill to ensure adherence to the Tax Strategy. The Board has oversight of tax and overall responsibility for tax compliance and tax governance within the UK Group.

## **Level of Risk**

The level of risk TMS International accepts in relation to UK taxation is consistent with its approach to other business risks. We consider reputation and corporate social responsibility as well as purely financial aspects.

When making decisions about tax we consider the materiality of any item as well as the cost of effective risk mitigation action. By being tax compliant we aim to minimise tax risk aided by the engagement of external tax advisory services to complement our internal teams.

## **Tax Planning**

When structuring our commercial activities, we will consider the tax laws of the countries in which we operate with a view to maximising value to our Stakeholders. For example, we will take steps to reduce the risk of “Double Taxation” however we will not put in place any arrangements that are contrived or artificial where the sole purpose is to reduce UK Tax. Our tax team seeks to deliver clear, timely and relevant business advice regarding tax and where there is any uncertainty surrounding the interpretation of tax laws we will seek the advice from local external tax advisors.

## **Our Approach to dealings with HMRC**

The UK Companies will comply with all relevant legal disclosure and approval requirements and all information will be clearly presented to HMRC as appropriate. In its dealings with HMRC the UK Companies will act in an open, honest and transparent manner.

We will seek to resolve issues with HMRC in a timely manner and if disagreements arise work with HMRC to resolve issues by agreement.