

Alstom Transport UK Group Tax Strategy

How tax risks are managed

Within the Global Alstom Group, ultimate management and responsibility for tax falls within the finance function.

At a UK country level, the Country Finance Director (“FD”) is tasked with applying this group policy through local governance, policies and procedures.

The FD and senior management have assessed that due to the size of the UK business, to ensure a high level of tax risk management, a dedicated tax team is necessary to provide support and assurance on accuracy of tax returns.

Key roles & responsibilities

FD/SAO (“Senior Accounting Officer”) - responsible for the ultimate governance of the UK group’s tax affairs.

UK tax team - meets with the FD periodically for a business and SAO update to ensure good communication flow between the tax team and senior management team. Responsible for day to day management of taxes and oversees the design, review and testing of the business units’ and functions’ tax controls. Provides guidance, advice and training as required to business units and senior management/Board through the FD.

Systems and controls to manage tax risk

The majority of financial information is provided through the UK Group’s financial management system. Functions/people involved in data input to the system are identified and provided with tax guidance and processes to ensure accuracy of reporting taxes. Functions/people preparing tax returns are provided with standard tax reporting tools, guidance and training and returns are reviewed by managers with relevant tax knowledge and guidance on how to perform an effective review.

Within the UK tax team, no one individual can be involved in the preparation of the tax return and final submission without review and sign off by someone adequately qualified and more senior.

Levels of tax oversight of the Board

The Board, through the FD, satisfies itself that the UK tax team is capable of effectively managing the UK tax affairs and monitoring and controlling tax risk. This is done through the SAO review and more regularly through the Financial Reporting & Compliance Director’s active daily involvement with members of the tax team.

The Board is kept up to date with significant or material tax risks and is made aware of tax impacts of business decisions through the FD, who ensures the proactive communication of information between the Board/senior management and the UK tax team, meeting periodically for a general business/tax update, whilst more urgent matters are highlighted and discussed immediately.

Through the FD’s review of annual tax returns, areas of risk or judgement are identified and, where considered significant would be taken to the Board/senior management for discussion and agreement, before the tax return would be approved to be submitted.

Use of external tax advisors

External tax advice will be sought to the extent that the UK tax team does not have sufficient resource, knowledge or experience of the relevant tax matter or where it is desirable to get a third party perspective. All advice sought is in respect to maintaining tax compliance in line with paying the correct amount of tax at the correct time and does not involve tax deferral or avoidance planning.

The UK senior management/Board acknowledges a significant percentage of the UK Group’s revenue is from direct or indirect government and public sector bodies and aggressive tax behaviours could significantly impact the Group’s future performance and ability to win new work.

As such, the UK senior management/Board are clear that the UK Group does not follow any form of tax planning which would be considered aggressive or could result in the UK Group from being excluded from bidding for commercial projects. As a result, Alstom Transport UK Ltd since its incorporation in 2013, has never entered any tax arrangement or scheme or is currently considering any scheme requiring disclosure under the Disclosure of Tax Avoidance Schemes regime (DOTAS) or have been challenged under the General Anti Abuse Rule (“GAAR”) or Targeted Anti Abuse Rules (“TAARS”). The UK tax team and third-party advisors are clear in their understanding that such schemes would not be considered by senior management and the Board.

The UK Group does however recognise government fiscal policies delivered through the tax system to encourage behaviours such as investment in UK R&D and energy efficient assets and will seek to claim such reliefs on correctly calculated amounts where available.

Tax risks

The UK Group, aligned with the Global Group’s policy towards tax and backed up by the Internal Controls and testing, is to ensure full and accurate tax compliance. Ultimate responsibility for this in the UK, set by the Global Group policy, rests with the FD. The Group does not formally set a level of acceptable tax risk and instead, through the engagement of the UK tax team, seeks to ensure full tax compliance in the UK.

In addition to the Group’s policies, the UK senior management/Board insists on full and accurate tax compliance and the FD has been tasked with ensuring this is implemented. The FD in turn tasks the UK tax team to ensure full and accurate compliance and supports this by providing regular and timely communication between the tax team and UK senior management/Board.

Working with HMRC

The UK Group maintains an open and collaborative relationship with HMRC, values its current low risk rating and seeks to ensure that this continues through practices and behaviours that will not be contrary to what HMRC recognise as a low risk entity. Behaviours are aligned to those which HMRC would expect from a low risk taxpayer. We recognise the inherent risks of operating within a large multinational Group, and ensure that these factors are considered and managed, as the UK Group seeks to maintain this low risk tax rating.

Should a situation arise where differing views could be taken on the tax treatment, following discussion with the FD (and where required, the senior management/Board), the CCM would be consulted through the UK tax team and where possible agreement reached on the interpretation of tax law.

Acquisition of Bombardier Transportation

In February 2021 Bombardier Transportation joined the Global Alstom Group.

In the UK, Bombardier Transportation business will represent a separate UK sub-group of the Global Alstom Group. The tax strategy outlining the approach to the tax management within this sub-group is governed by Bombardier’s UK tax strategy.

The publication of this statement is regarded as satisfying Alstom’s statutory obligation under Para 16(2), Schedule 19, Finance Act 2016 for the year ended 31 March 2021.

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Alstom UK companies

ALSTOM Transport UK (Holdings) Ltd

ALSTOM Transport UK Ltd

Alstom Product and Services Ltd

ALSTOM NL Service Provision Ltd

West Coast Traincare Ltd

West Coast Service Provision Ltd

Nomad Digital Ltd

Nomad Holdings Ltd

Nomad Spectrum Ltd

21 Net Ltd

Washwood Heath Trains Limited

ALSTOM Academy for Rail

ALSTOM Transport Service Limited

ALSTOM Network UK Limited

Nomad Digital (India) Limited