

Titan Group - UK Tax Strategy 2018

The Titan Group is an independent, vertically integrated cement and building materials producer operating across a wide market, including the UK.

Our corporate values (<http://www.titan.gr/en/titan-group/corporate-values/>) are at the core of who we are and we manage our tax affairs in a manner consistent with these. We want to anticipate customer needs to provide high quality products and services, we are open to change, rise to challenges as well as act with integrity at all times.

This Tax Strategy covers Titan's operations in the UK (referred to collectively as "Titan UK" or "we") and is published in accordance with Schedule 19 of the Finance Act 2016.

This Strategy applies to all taxes relevant to Titan UK and takes effect from the date of publication until superseded or otherwise replaced.

Governance in respect of UK tax

Titan UK is committed to observing all applicable laws, rules and regulations in meeting tax compliance and reporting responsibilities and ensuring that appropriate management structures are in place to meet those obligations. We are committed to applying diligent professional care and judgement, ensuring all decisions are taken at an appropriate level.

The Board of Directors of each Titan company in the UK has the responsibility for the tax affairs of the respective company including the implementation of this strategy.

We consider our tax affairs to be relatively simple and straightforward. To assist us in maintaining compliance with the UK tax legislation, we will engage with suitably qualified and reputable external advisors, including but not limited to the following scenarios:

- assistance with the preparation of UK tax returns;
- raising awareness of new tax laws or changes to existing tax laws and practices; and
- ensuring the implications of new and changes in tax laws to our business are understood.

Tax Risk Management

As part of a multinational organization, we face a number of tax risks largely due to the complexity of tax law and regulations as well as compliance and reporting risk.

We seek to comply with all our tax compliance and reporting and tax payment obligations in the UK. We have developed key internal controls and processes to ensure these are met accurately and on a timely basis.

As a Group, we have developed a methodology to identify, assess, prioritize and manage tax risk across all our businesses including those in the UK, which helps us to ensure we implement sufficient controls and mitigate identified risks. This includes the business seeking opinion from external Tax advisors where required.

Where risks are identified, we ensure appropriate action is taken to mitigate identified risks. Where appropriate, we engage with tax authorities to disclose and resolve issues, risks and any uncertain tax positions.

We use external advisers to provide tax technical advice, legal expertise and additional resource based on an assessment of risks and requirements. Where deemed appropriate, we may rotate between different advisers as this may help us to reduce tax risk and allows us to seek different forms of opinions on recurring tax obligations/issues.

Attitude towards tax planning and level of risk

We take a conservative approach to tax risk and we strive to keep tax risk at a low level.

Where any tax planning takes place, it is in support of genuine commercial activity.

We strive to do things in the correct manner, always taking into consideration the Group's Code of Conduct and core values. We strive to be efficient with our tax affairs and therefore we will make use of available tax incentive and reliefs as they are intended to be used by the UK Parliament and other governments for that matter.

Approach to dealing with the UK Tax Authorities

We seek to maintain an open and cooperative relationship with HM Revenue & Customs ("HMRC"), covering past, present, and where applicable, future events. We achieve this by:

- acting with integrity at all times;
- meeting statutory obligations/deadlines; and
- responding with full disclosure to any enquiries from HMRC on a timely basis.

We believe in being honest and seek to work with HMRC on a professional basis to ensure we pay the right amount of tax when due.