



Kal Tire's UK Tax Strategy

1 Scope

2 Introduction

3 Tax Risk Management & Governance

4 Tax Planning

5 Relationships with Tax Authorities

Kal Tire's UK Tax Strategy

1. Scope

Kal Tire's UK tax strategy applies to the UK entities of the Kal Tire group in accordance with *Part 2 Publication of Tax Strategies of Schedule 19 to Finance Act 2016* with respect to the financial year ending 31 December 2023.

This strategy applies from the date of publication until it is superseded. References to 'UK Taxation' are to the taxes and duties set out in *Paragraph 15(1) of Schedule 19* which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Land Tax. References to 'tax', 'taxes' or 'taxation' are to UK taxation and to all corresponding worldwide taxes and similar duties in respect of which the Group has legal responsibilities.

The group's ultimate parent is not in the UK and has UK subsidiaries (the 'UK sub-group') all under Kal Tire (UK) Limited which is a UK intermediate parent.

Kal Tire's UK sub-group consists of the following companies:

1. Kal Tire (UK) Limited,
2. OTR Holdings Limited,
3. Kal Tire Southern Africa Holdings Limited, and
4. OTR Tyres Limited.

2. Introduction

Kal Tire is Canada's largest independent tire dealer and North America's largest commercial tire dealer. Kal Tire's Mining Tire Group is an international leader in mining tire service and supply, servicing more than 150 mine sites across five continents.

The AIMS of the Kal Tire team are seven guiding principles that are a guide as to how business will be conducted and provide a foundation from which to work and make decisions. Our

approach to tax is aligned with those AIMS. <https://www.kaltire.com/en/aims/>

We aim to earn a fair profit, which includes the meeting of obligations required to pay our fair share of taxes to the relevant jurisdictions we operate in.

3. Tax Risk Management & Governance

We aim to conduct ourselves with honesty and integrity while recognizing our responsibility to our communities, which includes observing, respecting, and adhering to the tax laws of the countries we choose to conduct our business in.

Kal Tire's propensity to assume tax risk is low and this is consistent with the AIMS of the Kal Tire team. Tax risk is managed by ensuring that there are appropriately qualified and experienced employees in the tax function, establishing processes and procedures to mitigate risk, and using external advisors where necessary or appropriate.

We also seek to operate an effective tax control framework to identify key tax risks and to manage those risks through appropriately and adequately designed internal controls, policies, processes, and providing adequate training.

We regularly monitor our tax controls to ensure they operate effectively, and that the tax function is informed of relevant developments by the wider business on a timely basis.

Kal Tire (UK) Limited has a tax framework that has been approved by the Group CFO. Tax risk is managed pursuant to documented policies, which where relevant, have been adopted by the Board of Directors ('BOD') of the UK entities. Below Board level, responsibility for tax compliance, Tax Accounting & Reporting, Indirect Tax, Corporate Tax Audit, and Transfer Pricing is cascaded from the Group Tax Department to Regional teams and through consultation with professional advisors.

We report on a periodic basis to the Group's BOD and relevant Committees outlining compliance with relevant tax legislation. This reporting enables the BOD and the various Committees to provide governance and oversight on Kal Tire's approach to tax.

the aim of avoiding confrontation with local tax authorities.

4. Tax Planning

We consider a variety of tax alternatives when considering in what manner to structure commercially motivated transactions. Kal Tire engages in efficient tax planning that supports our business and is reflective of the commercial and economic activities. However, we do not pursue aggressive tax planning for the purpose of tax avoidance. We understand the importance that we act responsibly and are not interested in intentionally engaging in tax strategies that are contrary to the intention or "spirit" of tax legislation.

Accordingly, we take an appropriate and balanced approach when considering how to structure tax sensitive and / or material transactions and consult with our advisors on a as needed basis.

5. Relationships with Tax Authorities

Kal Tire is committed to having a cooperative, professional, open, and transparent relationship with all tax authorities for the jurisdictions in which we operate to maintain a relationship of mutual trust and respect.

We leverage our tax risk management and governance framework in order to meet our relevant UK tax compliance obligations by filing tax returns and making tax remittances by the due dates required under laws and regulations.

Where tax legislation is unclear or subject to interpretation, reliable external advice or advance rulings from tax authorities may be sought to support Kal Tire's tax positions with