

CEVA Logistics UK Tax Policy

This tax policy is published to ensure that the group fulfils its responsibilities as set out in paragraph 16 (2) of Schedule 19 FA 2016

This tax policy relates to the following UK entities and applies to the year ended 31 December 2023 in respect of all UK duties and taxes. This document has been approved by the UK statutory directors:

- CEVA Group Limited and all its UK subsidiaries;
- CEVA Real Estate UK Limited;
- CEVA Logistics Forwarding UK Limited;
- CEVA Ground Logistics UK Limited;
- AutoXP Limited;
- XP Tech Limited.

The tax policy forms part of the group's wider business strategy and has been prepared in accordance with and to support other key policy documents, including the corporate social responsibility policy, risk management policy, ethics policy, code of conduct policy and other relevant policies.

Tax strategy, governance and tax risk management

Currently the group policy, with regards to tax is that CEVA strives to be compliant with tax law in each jurisdiction with the objective of having certainty in its tax affairs.

The group's overriding objective is to pay the right tax at the right time in each jurisdiction that it operates. The group ensures these objectives are met by amongst others:

- Compliance with all applicable laws and regulations and constant monitoring of proposed changes in UK tax legislation to identify any impacts on the UK group;;
- Regular and open dialogue with all applicable tax authorities;
- Regular communication with finance, treasury and legal staff within the UK and overseas to ensure the tax department is kept informed of all relevant issues;
- Ensuring those staff responsible for tax have the appropriate knowledge and receive the appropriate training on an ongoing basis and that those staff stay up to date with developments through regular communications from advisors;
- Ensuring robust systems and controls are in place in respect of tax accounting processes;
- Ensuring tax risks are highlighted, understood and managed and applicable controls are in place to ensure these risks are mitigated.

The responsibility for the tax strategy, the supporting governance and management of tax risk ultimately sits with the Group Chief Financial Officer and the Global Head of Tax, assisted by the group's Senior Accounting Officers and wider CEVA Group tax team.

A corporate group risk register is maintained by each function within the business and this is periodically updated through discussions with senior management. In addition, at

a local UK level, a full list of operational tax risks is maintained and which are discussed quarterly with the UK statutory directors.

Attitude to tax planning

The Group takes a conservative approach to tax planning. The group ensures that tax planning is undertaken to comply with the applicable laws and regulations in the UK and overseas and that any tax planning is consistent with values and integrity of the group.

The group only engages in tax planning that is aligned with its commercial business activities and all tax planning must have a business purpose. However, where alternative routes exist to achieve the same commercial result, the most tax efficient approach in compliance with all relevant laws would be considered.

The group engages with third party external advisors when necessary to ensure that the tax consequences of all significant transactions are fully understood, have been implemented tax efficiently by taking advantage of available tax incentives, reliefs and exemptions and are in accordance with and in the spirit of applicable laws and regulations.

The group does not enter into any contrived, artificial or aggressive transactions and does not undertake any tax planning, transaction or structure that are notifiable to the tax authorities under mandatory disclosure regimes.

Tax risk

The Group is not prepared to accept high levels of tax risk and seeks at all times to be in 'control' of its tax obligations through the group's tax risk management process as described above. The group's overriding objective is to have certainty in its tax affairs. The group achieves this by ensuring it is at all times fully compliant with all UK laws and regulations, that there is regular dialogue between the tax department and the wider business and that the tax implications of all transactions are fully understood and are consistent with the group's values and corporate social responsibility.

However, the group accepts that it is not able to remove tax risk completely given the changing tax legislation and/or uncertainty in the tax legislation, but that the group aims to manage it to an appropriate level by the delivery of its tax risk and government framework.

Relationship with tax authorities

CEVA considers that its relationship with the tax authorities to be an important and integral part of its tax strategy in ensuring the group meets its aims of paying the right tax at the right time and having certainty over its tax obligations. This is achieved by:

- Having an open, transparent and constructive relationship with the tax authorities;
- Maintaining regular communication in respect of open issues and holding annual risk review meetings;
- Working wherever possible with the tax authorities in real time to ensure issues and significant business transactions are discussed and understood by both parties as they occur and that any relevant guidance or clearances are obtained as necessary to ensure compliance with applicable laws and regulations.

- Disclosing all relevant facts and details of the adopted tax treatment of any transactions where there is the potential for the tax treatment to be uncertain in the submission of the group's tax computations and returns;
- Ensuring that any inadvertent errors in submissions made to the tax authorities are fully disclosed as soon as is reasonable practical.