West is committed to paying the right amount of tax to the right jurisdiction at the right time; this is fundamental to West’s commitment to acting responsibly.
West Tax Policy

The policy covers West’s approach to managing its tax affairs. It is made up of five key articles as follows:

1. *Commitment to Compliance with Tax Laws:* West is committed to compliance with UK tax rules and regulations, and therefore invests resources in a reasonable effort to assure that West pays the right amount of tax at the right time. This involves a willingness to make known any pertinent and relevant facts to tax authorities in order to assure these authorities that West has paid the tax it is required to pay and that it has received any tax incentives it may be due.

2. *Responsible Business Structure:* West is committed to acting responsibly when arranging its affairs. It enacts no structure solely for tax purposes, but aligns its business affairs to minimize tax and other business-related inefficiencies, such as double taxation of an income stream and/or flexible access to capital.

3. *Appropriate Risk Management:* Given that tax laws are numerous, complex and change often, West engages outside consultants to assist with tax compliance and global business structuring issues to assure compliance with UK tax rules and practices, as well as with the tax rules of other jurisdictions where West and its affiliates operate. West management works closely with these outside advisors to assure that advisors understand all pertinent facts and business objectives. West structures its world-wide affairs based on bona fide economic and commercial considerations, and not through contrived or fabricated notions.
4. **Honest and Respectful Attention to HMRC Requests and Audits**: West will deal with HMRC with attentiveness, a spirit of cooperation, and respect. Since we do not take positions contrary to tax rules, it is not expected that any in-depth or serious review by HMRC will result in any adjustments to tax. However, if approached, management’s goal would be to address any questions or concerns from HMRC with alacrity and openness, being fully responsive to any requests.

5. **Oversight and Attention**: This policy aligns with West’s code of ethics and mode of operation. It also has been approved by the management authority for West (the ”Board”), with management of such policy in the day-to-day hands of West management under the oversight of the Board.