

JAGUAR LAND ROVER'S APPROACH TO TAX

Introduction

We are committed to complying with the tax laws and regulations in the countries in which we operate and have a policy of zero tolerance towards non-compliance. We embrace our Creators Code in all that we do to curate and enhance our Modern Luxury customer experience and brand reputation as a responsible taxpayer. Jaguar Land Rover is a global business and as such our operations are large and complex. As a result, we operate through multiple companies, with activities, employees and assets located in numerous countries around the world. This, in turn, naturally drives an inherent level of complexity in our tax affairs. The global business is however united in adopting the following key tax principles which are aligned with our business behaviours.

Jaguar Land Rover's key tax principles

The following core principles have been formally adopted by the Jaguar Land Rover Automotive plc Board in relation to our approach to tax matters and the conduct of our tax affairs.

1. **Compliance** - We act with integrity, both within the letter and spirit of all tax legislation and relevant international standards. We have a zero tolerance to tax evasion, including the evasion of tax by third parties associated with our business. We ensure that the right amount of tax is paid at the right time in the right country. As a commercially driven organisation, we consider the tax consequences of our decisions, but we do not engage in transactions without commercial substance with the sole purpose of avoiding tax. In making business decisions we seek to maximise value to our stakeholders. Tax decisions are driven by core values of integrity, unity and responsibility and planning is driven by commercial rationale.
2. **International tax** – We embrace business unity to ensure that our international tax affairs are aligned and kept current with the substance of our business operations in keeping with international tax guidance. We do not engage in any form of artificial tax structuring and we do not operate in or use any offshore tax havens. All Jaguar Land Rover subsidiaries are located in countries where the business has significant physical and economic operations. We claim reliefs, credits, incentives and exemptions that are legislated in the countries in which we operate and have a genuine presence.
3. **Relationships with governments and tax authorities and industry associations where we operate** - We seek to maintain trusting, transparent and constructive relationships with tax authorities, including HMRC in the UK, and to engage in future tax policy and legislation to create shared value.
4. **People** – We invest in our people, their continued learning and growth to deliver on these commitments. Regular updates are provided on recent tax related developments through training and focused sessions.

Our Approach to Tax Risk

We maintain a limited appetite for tax risk and continuously strive to limit tax risks in line with the principles outlined above.

A risk assessment model is applied to assess any significant transaction to ensure that these principles are adhered to.

Our business is global and we operate in numerous countries, each of which has its own tax legislation. Tax law is often complex and subject to change and interpretation. Recent international tax developments further add to this complexity. Therefore, a degree of tax uncertainty is inevitable. We

partner with the business to provide appropriate and current tax advice on the implications of business decisions.

Where local legislation permits, we may seek advance agreement from the relevant tax authority, including advance pricing agreements to ensure that we do not pay tax on the same profits twice. In the event of any audit activity or scrutiny, we seek to engage with the relevant tax authorities to provide all relevant information in a transparent and timely manner to resolve any matters efficiently and effectively.

Managing Our Tax Risk and Our Governance Framework

Our tax strategy is approved by the Board annually and tax risks are reported quarterly to the Financial Risk and Assurance Committee. Appropriate accounting and financial oversight is exercised through the Audit Committee with the Chief Financial Officer having oversight responsibility on behalf of the Board.

We maintain a robust risk framework to ensure adherence to these principles. We achieve this through internal reviews, refreshing our policies periodically and seeking external advice wherever required in case of interpretational issue or uncertainty. Our key tax principles are embedded in roles and responsibilities outlined in our tax charter which is issued annually across the global business.

Responsibility for the day-to-day management of Jaguar Land Rover's tax affairs rests with our central Tax function, comprising an appropriate blend of tax professionals led by the Jaguar Land Rover Tax Director. In addition to the central Tax function, the business also has dedicated tax professionals embedded within the finance teams of key non-UK subsidiaries. All have the necessary qualifications, training, skills and experience required to effectively undertake their roles and ensure that our compliance standards are met. The Tax function also advises the Jaguar Land Rover Automotive plc Board in relation to setting Group tax strategy and policy.

Where appropriate, we look to implement technology-based solutions to track compliance, streamline processes, drive efficiency and manage risk including reviews and escalation where necessary.

Jaguar Land Rover Automotive plc regards this document and its publication as complying with its duty under Para 19(2), Sch 19, FA16.