

UK Tax strategy

The purpose of this document is to describe the tax strategy of the UK entities pertaining to the Boardriders Group.

Corporate governance with respect to UK taxation

Our UK entities are responsible taxpayers and comply with applicable tax law and regulations.

We encourage transparent business practices and respect ethical rules. Our tax strategy is aligned with the Group's strategy to create value for its shareholders, customers, suppliers, business partners and employees. We ensure that taxes are managed to provide outcomes consistent with commercial reality.

We have a fair approach in the management of taxes including all corporate income taxes, indirect taxes, and employment taxes. We do not employ harmful practices for purposes of tax avoidance

We ensure that the tax liability recorded in the financial statements of our UK entities has been correctly estimated in accordance with the tax law and regulations.

Our tax liability is reviewed and approved by external auditors once a year. We regularly use the tax advices of external tax experts to get access to the tax watch and increase our tax knowledge.

Tax risk management and tax planning

We make tax part of every important business decision. The financial, accounting and tax teams are regularly consulted on the main business operations to ensure that we respect the tax regulation.

We seek to reduce the level of tax risk arising from the entities operations.

We only engage in reasonable tax planning that is aligned with our commercial and economic goals.

We comply with the OECD guidelines with respect to declaring income where the value is actually created. We meet the arm's length principles.

Our entities' appetite for tax risk is low and we do not participate in any aggressive tax planning.

Relationship with HMRC

We report and disclose our tax positions in accordance with applicable regulations and requirements.

We are committed to provide transparent, reliable information, documenting tax positions to HMRC.

We fully cooperate with HMRC in full transparency and are committed to maintaining good relationships with HMRC.

We usually seek for compromise to resolve disputes and avoid tax litigations.

October 31st, 2018. Eliane POINSENOT, BOARDRIDERS EMEA Tax Director