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## ***UK Tax Policy***

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Amentum is publishing this statement pursuant to the requirements of the United Kingdom Finance Act 2016, Schedule 19, *Large Businesses: Tax Strategies and Sanctions*, paragraph 22(2). This statement is applicable to the tax policy in the United Kingdom in which Amentum operates through the Amentum UK Group.<sup>1</sup>

### ***I. Overview***

Headquartered in Germantown, Maryland (U.S.A.), Amentum is a premier global technical and engineering services partner supporting critical programs of national significance across defense, security, intelligence, energy, and environment. We draw from a century-old heritage of operational excellence, mission focus, and successful execution underpinned by a strong culture of safety and ethics. In the United Kingdom, we serve such clients as the UK Nuclear Decommissioning Authority and the Ministry of Defence. As of 30 September 2020, we employed more than 20,000 people across the USA, and 28 other countries and territories.

We strive to create ethical working relationships with all of our various stakeholders. As a leading global contractor, we operate under a broad range of economic, political, social and cultural customs and traditions, as well as different local, regional, and international laws and regulations. We believe it is our duty and responsibility to conduct business with the highest level of integrity, ethics, and compliance in all situations.

### ***II. Our UK Tax Policy***

Amentum believes that sustainable decision making includes careful consideration of tax consequences. We employ a balanced commercial perspective in our tax dealings to achieve reasonable and responsible outcomes that serve our stakeholders. We incorporate our core values in every aspect of our compliance with tax laws. To do so, Amentum follows the below principles regarding its responsibilities towards taxation in the United Kingdom –

#### ***1) Our approach to risk management and governance arrangements***

Amentum conducts its business with the highest honesty and integrity. Our policies, including policies governing our tax matters, are aimed at ensuring compliance with all applicable UK and non-UK laws. The Amentum UK Group is part of a global control framework through which our staff manage tax risks, supported where necessary by advisors.

Tax risks are monitored on an on-going basis. We manage and enhance our tax processes, systems, and controls through regular governance meetings and reports to identify, assess, manage, and monitor tax risks arising from business transactions and operations, and changes in tax law. Amentum is fully supported by its Chief Financial Officer and Vice President of Tax in ensuring that Amentum's tax policies are followed. Together, they are responsible for all taxes that affect the business, including taxes arising in the context of commercial transactions. The

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<sup>1</sup> See Appendix for members of the Amentum UK Group as of 09/30/2020.



Vice President of Tax is responsible for establishing procedures and guidelines for tax positions. Amentum's directors approve transactions with material tax positions based on the comprehensive analysis performed by the Amentum tax department and any external advisors. Amentum's tax affairs are subject to Amentum's Code of Conduct which requires the compliance with all laws, rules, and regulations.

*2) Our attitude towards tax planning and acceptable tax risk*

Amentum's core values provide a framework for our attitude to tax planning. Given our business is heavily regulated and our customer base is principally governmental entities, we work to deserve and maintain our reputation as a compliant contractor, including with respect to tax laws. As a result, we make every effort to be fully aware of the tax implications of the commercial and governmental transactions we are considering. Based on such understanding, we strive to carry out such transactions in the most tax-efficient manner, that is sustainable over a long period of time and without undertaking undue tax risk. We pursue efficient tax positions built upon sound commercial practices. We may seek external professional advice where the tax law is unclear or subject to interpretation.

*3) The level of risk in relation to UK taxation that the Company is prepared to accept*

We deliver results for our stakeholders in a sustainable manner by seeking to establish the tax consequences of a commercial transaction before entering into it, taking advice where necessary from external advisors and where appropriate, seeking confirmation whether formally or informally from a relevant tax authority.

We recognize the importance of our reputation and of our economic contributions to the communities we serve by paying the appropriate amount of tax in a timely manner. We exercise reasonable care and due diligence in reviewing legislative, administrative, and judicial guidance available for tax positions. Amentum has a low risk tolerance for tax positions.

*4) Our approach towards dealings with Her Majesty's Revenue and Customs*

We strive to build relationships with HMRC based on mutual respect and cooperation. We make full disclosure of key transactions and facts in relevant tax filings. We endeavor to respond timely and completely to requests for information from HMRC and to engage in open dialog towards resolution as efficiently and openly as possible.



## Appendix

The following entities comprise the “Amentum UK Group”, each of which approved of this UK Tax Policy –

- Amentum N&E UK Holdings Ltd.
- Amentum International Holdings UK Ltd.
- Amentum (UK) Ltd.
- Amentum Facility Management UK Ltd.

