

AtkinsRéalis



GLOBAL TAX STRATEGY



Global Tax Strategy

As a leader in the design and delivery of the built environment, we have a tremendous opportunity to have a positive impact on society by working in partnership with our clients to make the world more environmentally sustainable for all. AtkinsRéalis generates the knowledge, the ingenuity, and the drive to meet so many of today's most pressing challenges – population growth, transportation, and climate change to uplift communities and drive a safer, better tomorrow.

AtkinsRéalis is a world-leading professional services and project management company with offices around the world.

We care about the big issues facing the planet and are committed to engineering a better future for its people. We believe that taxes have a pivotal role in supporting AtkinsRéalis' goals in environmental, sustainable, and social responsibilities. Our **tax contributions** impact the communities and territories in which we operate, and we recognize the part we need to play, as most actions we undertake will have a tax consequence. Our **tax strategy** demonstrates our commitment to **tax transparency** by setting out the Group's approach to governance and tax risk management as applied within our business operations.

Our **Code of Conduct** is there to ensure integrity and transparency in the conduct of our business and our relationship with others. Our employees all have a duty and responsibility to report in good faith any concerns about the behaviour of the AtkinsRéalis Group or any individual associated with the Group regarding our Code of Conduct. This includes any violation of the laws, rules, regulations, or corporate and other policies that apply to us, our business group and/or operating unit or the Company or any observed instances of misconduct or pressure to compromise the Company's standards.

Our tax strategy is applicable to all AtkinsRéalis personnel and entities controlled by the AtkinsRéalis Group. A separate and aligned [UK tax policy](#) is also published on the external AtkinsRéalis website to fulfil compliance with UK legislation.



Our Approach to Tax

We are exposed to a variety of tax related risks, including tax compliance and reporting, transactional and reputational.

We strive to adhere to all relevant tax regulations and ensure tax compliance in each country in which we operate.

We have a responsibility to pay the appropriate share of tax in each of the jurisdictions in which we operate while, at the same time, balancing our responsibilities to shareholders.

We assume a conservative approach to tax risk and to the adoption of tax positions. Assessment of risk will take account of reputation, brand, governmental relationships, the benefit of certainty and tax authority relationships.

We are committed to the principles of openness, cooperation, communication, and transparency in our approach to dealing with tax authorities.

AtkinsRéalis maintains strong internal policies and procedures to support our tax governance framework, which aligns with our wider risk and control framework.

Tax governance

The Senior Vice President – Taxation reports directly to the Chief Financial Officer (CFO) who, by delegation of the Board of Directors, is responsible for AtkinsRéalis' overall tax strategy, supporting a governance framework and management of tax risks, with key tax issues being reviewed by AtkinsRéalis' Audit Committee. The AtkinsRéalis global tax strategy has been reviewed and approved by the CFO and is periodically updated.

Tax compliance and reporting

We strive to file our tax returns and pay our taxes on a timely basis in accordance with applicable laws.

We seek to ensure that tax disclosures are made in accordance with relevant domestic and international legislation and financial reporting standards such as International Financial Reporting Standards (IFRS), Internal Controls over Financial Reporting (NI 52-109) and OECD regulatory framework amongst others.

Tax planning and incentives

In consultation with the global tax and HR teams, AtkinsRéalis structures its businesses in a tax efficient manner while remaining compliant with all applicable tax laws.

Where there are alternative methods to achieve the same commercial results or business purpose, we will consider all relevant factors, including taxation, before deciding the best option. On a case-by-case basis, where there is uncertainty as to how the relevant law should be applied, and depending on other factors such as materiality, uncertainty, application of recently enacted legislation or special technical challenges, we may seek external professional advice to support the decision-making process.

In optimizing our tax position, we may access incentives offered by government authorities, for example research and development tax credits or government grants. Where we do so, we ensure this is consistent with the relevant regulatory framework and spirit of the law.

Transparency

All dealings with tax authorities, government officials and third parties are undertaken in a professional, courteous, and timely manner. In the event of an error arising, we seek to remedy, disclose, and proactively resolve, as soon as reasonably practical after identification as required by law.

AtkinsRéalis is dedicated to the framework for co-operative compliance as developed by the OECD and has been filing the Country-by-Country Report (CbCR) in Canada (with the Canada Revenue Agency) and in jurisdictions where we operate in the world that do not currently have active exchange relationships but where CbCR filing is required.

Tax technology

We recognise the importance of technology as a means of improving the quality and accuracy of information and strengthening our tax processes. As part of our finance transformation project, we are evaluating and implementing alternative technological solutions as a means of enhancing tax data integrity and facilitating tax transparency.



Our Approach to Tax Evasion

AtkinsRéalis has a zero-tolerance policy with respect to any criminal facilitation, including tax evasion, and would never accept being complicit in facilitating a third party to evade taxes in any jurisdiction. AtkinsRéalis will not engage in, facilitate, or be associated with any form of Tax Evasion anywhere in the world.

Tax Evasion refers to the unlawful evasion of taxes performed by misrepresenting the taxpayer's affairs with the goal to reduce or eliminate their tax liability. It may take the form of dishonest tax reporting through the understatement of income or gains or the overstatement of deductions or losses. Tax evasion can be realized by individuals, corporations, or trusts. Facilitation of Tax Evasion refers to deliberate and dishonest action (or omission) to assist another person to evade taxes in any jurisdiction.

Tax Evasion covers all forms of tax, including but not limited to, payroll and employment taxes, national insurance and social security contribution, capital taxes, corporation tax, customs and duties, VAT or other indirect sales and goods taxes irrespective of territory.

The AtkinsRéalis [Code of Conduct](#) details the variety of reporting channels for raising concerns about unethical or unlawful behaviours relating to tax and includes a third-party reporting line and separate targeted training to communicate and raise awareness of the risks of facilitating tax evasion is provided to key personnel.

Managing Tax Risks

AtkinsRéalis has an established Global Tax Team, consisting of appropriately qualified and trained professionals, that manage tax risks at both a central oversight level and a regional management level.

We have substantial in-house teams in the US, UK, and Canada responsible for managing local tax returns, providing tax planning and advice to project and bid teams, monitoring tax risks and maintaining relationships with local tax authorities.

Our Global Tax team, which is also present in the Middle East and India, provides tax stewardship for every country in which we operate to ensure tax compliance and monitor tax risks.

It is understood that there is always some level of tax risk associated with operating in multiple tax jurisdictions, frequent changes in tax laws and different tax authorities taking differing interpretations regarding the application of relevant tax legislation. We value and take very seriously our reputation as a responsible taxpayer not least as we recognize not only the social impact tax contributions have on the economies in which we operate but also the potential impact of not complying on our ability to win work, particularly with Government bodies.

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