



Battelle Memorial Institute UK Tax Strategy

Overall Tax Strategy

Battelle is a tax-exempt organization pursuant to Section 501(c)(3) of the Internal Revenue Code ("IRC") and is classified as a public charity pursuant to IRC Section 509(a)(1). As a tax-exempt organization classified as a public charity, Battelle must comply with all rules and requirements applicable to tax exempt organizations. Battelle's tax strategy is aligned with the overall mission and purposes and to its affiliate's approach to corporate governance and risk management whenever we operate. This strategy applies to the following UK entities:

- Battelle UK, Limited
- SeeByte Limited
- SeeByte Holdings Limited

In compliance with section 161 and section 19(2) schedule 19 of the Finance Act 2016, Battelle Memorial Institute is publishing its tax strategy.

Our tax policy comprises the following components:

1. Governance and Risk Management

Battelle Memorial Institute and its affiliates are exposed to many risks that could negatively impact our ability to achieve our strategic and operational objectives. We intend for strong risk management practices to support the business in making informed decisions and to improve the likelihood of achieving our strategic and operational objectives. Battelle acknowledges that risks can never be fully eliminated so we have in place programs that provide a structured and focused approach to managing risk.

Risk assessments will be conducted on major new projects, ventures, processes, systems and commercial activities to ensure that they are aligned with our goals and objectives. Any material risks or opportunities arising from these assessments should be identified and further assessed so they can be properly managed.

2. Tax Planning

Tax planning and decisions will be made at all times in a manner which is consistent with Battelle Memorial Institute's overall strategy.

We are committed to comply with tax laws and regulations in the UK and where available we seek to utilize tax reliefs and incentives in a manner that is consistent with the UK government's objectives. Professional advice is sought on a transactional basis as we have responsibilities to minimize our tax risk and comply with tax laws and regulations.

3. Approach toward Tax Risk

Given the complexity of tax law, we actively seek to identify, evaluate, monitor and manage these risks to ensure they remain in line with strategic and operational objectives. We understand the importance of tax in business decisions and ensure tax is considered as part of our decision-making process.

Where there is significant uncertainty or complexity in relation to a risk, we seek expert advice from professional tax advisers. Our approach is to ensure compliance and that we understand our responsibilities with regard to tax.

4. Relationship with the HMRC

Battelle and its affiliates are committed to the principles of openness, integrity, and in a spirit of co-operative compliance with the tax authorities. We engage professional tax advisers for tax planning and compliance obligations and in number of cases they liaise with the HMRC on our behalf.

This document, approved by Battelle Memorial Institute, sets out Battelle Memorial Institute and its affiliate's policy and approach to conducting its tax affairs and dealing with tax risk, and is made available to Battelle Memorial Institute group's stakeholders.