

# Convera UK Tax Strategy – Financial Years Ending 31 December 2025 and 2026

This document sets out the UK tax strategy of Convera Topco Limited and its UK subsidiaries (together, “Convera”, “we” or “the Group”) for the financial years ending 31 December 2025 and 2026. It has been approved by the Board of Directors of Convera Topco Limited and is published in accordance with paragraph 16(2) of Schedule 19 to the Finance Act 2016.

## Introduction

Convera is a leading provider of cross-border commercial payments and foreign exchange (FX) services with Convera legal entities supporting customers and partners in 19 countries. Our operations are subject to a range of taxes, including corporate income tax, employment taxes, VAT, and property taxes. We also collect and remit taxes such as PAYE and NIC on behalf of employees.

We are committed to managing our UK tax responsibilities with integrity and transparency, ensuring compliance with all applicable tax laws and regulations.

Convera recognises that the management of tax affairs is an important element of its broader responsibility to stakeholders, including customers, regulators, and the communities in which it operates. Our approach to tax is aligned with our commitment to acting responsibly and maintaining trust.

## Governance and Risk Management

The Board of Directors of the UK entities within the Group have overall responsibility for Convera’s UK tax strategy and governance. Day-to-day responsibility is delegated to the Chief Accounting and Tax Officer based in the UK, who provides regular updates to the Board of Directors of each such UK entity.

This governance structure ensures that:

- Tax compliance status is monitored;
- Material tax risks are identified and managed; and
- Tax decisions align with the Group’s overall risk management framework.

Convera maintains robust internal controls, policies, and procedures to manage tax risks. These are overseen by experienced professionals within the Finance and Risk teams and are supported by reputable external advisors where necessary.

Our UK tax strategy is reviewed and approved annually by the Board of Directors of each UK entity.

## Approach to Tax Planning

Convera’s approach to tax planning is aligned with its commercial and economic activities. We do not engage in artificial or non-commercial arrangements to gain tax advantages.

Our tax planning:

- Supports genuine business operations;
- Reflects the intention of the relevant legislation; and
- Seeks to utilise available tax reliefs (e.g., capital allowances, R&D credits) in a responsible manner.

Where tax matters are complex or uncertain, we seek independent, professional advice to ensure compliance and mitigate risk.

## **Tax Risk Appetite**

Convera adopts a low-risk approach to tax and does not take positions that could give rise to material uncertainty, reputational risk, or unintended tax outcomes inconsistent with the underlying commercial activity.

We aim to:

- Identify and manage tax risks proactively;
- Ensure tax positions are supported by appropriate documentation and advice;
- Monitor changes in tax legislation and adapt our processes accordingly; and
- Conduct tax due diligence on significant acquisitions, with Finance team involvement throughout the M&A lifecycle.

## **Relationship with HMRC**

Convera is committed to maintaining a transparent, cooperative, and professional relationship with HM Revenue & Customs (HMRC). We:

- Engage openly and constructively with HMRC;
- Disclose relevant information in a timely manner; and
- Seek to resolve any disputes promptly and respectfully.