Larsen & Toubro Limited L&T House, N.M. Marg, Ballard Estate, Mumbai- 400001



## UK TAX STRATEGY [2020-21]

#### **Introduction**

In accordance with the requirement of Para 22 of Schedule 19 of the Finance Act 2016, we are publishing this document as the tax strategy with respect to Larsen and Toubro Limited's ('L&T') UK subsidiaries and branches for the period ended 31<sup>st</sup> March 2021 [fiscal year of parent]. This document is publicly available on the website of the company [www.larsentoubro.com]

All of L&T's subsidiaries and branches in UK are hereafter referred to as 'Group'.

Our tax policy comprises the following components:

#### Management of UK Tax Risks

The day-to-day management of UK Tax matters are supervised by the respective Finance and Accounts Head of the branch/subsidiary. The Group sees compliance with tax legislation as key to managing tax risks. External advice from tax experts is sought, if thought necessary, in cases involving interpretation of statute or procedural requirement. Due consideration to tax impact is given while entering into any transaction.

#### <u>Attitude towards Tax Planning</u>

The Group aims to operate in an efficient and legally compliant manner and seeks to minimize the risk of uncertainty and disputes. We do not engage in aggressive and contrived tax planning or tax structuring for the sole purpose of gaining tax advantage. We seek to conduct transactions between the entities of the L&T Group companies on an Arm's length price in accordance with the OECD Transfer Pricing Principles.

#### <u>Risk Review</u>

The Group sees compliance with tax legislation as key to managing the tax risks. We operate an effective tax control framework to identify tax risks and to manage those risks through appropriate policies and processes.

#### <u>Approach to dealings with HMRC</u>

The Group believes in a transparent and collaborative relationship with HMRC. Due care is taken to ensure that all details filed with HMRC are accurate and complete. When the Group is uncertain regarding the interpretation of law, in appropriate cases, it may choose to discuss with HMRC to determine possible differences in interpretation. We may opt to litigate where we disagree with a ruling of the tax authority through transparent discussions and negotiation.

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The list of L&T UK subsidiaries/branches as on 31<sup>st</sup> March 2021 are as under:

Sr. No	Name of Subsidiary/Branch	Tax Identification Number	Address	Nature of Business
1.	Thalest Limited [Subsidiary of Larsen & Toubro International FZE. Stake acquired on 3rd April, 2012]	1775006699	1 Endeavour House Bentalls Industrial Estate, Holloway Road, Maldon Esssex- CMP 4ER	Supply of control and instrumentation systems for the marine, power and generation industries
2.	Syncordis Limited [Subsidiary of Syncordis SA. Stake of Syncordis SA acquired on 15 <sup>th</sup> December, 2017]	7623923555	3 Sheldon Square, Paddington, London W2 6PY	Provides Information technology consultancy activities
3.	Larsen & Toubro Infotech Limited - UK Branch [Branch formed on 5 <sup>th</sup> January, 1997. Larsen & Toubro Infotech Limited is a subsidiary of L&T]	8593715293	10th Floor(North), 6 Bevis Marks, London- EC3A 7BA	Provides technology consulting and digital solutions
4.	L&T Technology Services Limited - UK Branch [(Branch formed on 2 <sup>nd</sup> August, 2013. L&T Technology Services Limited is a subsidiary of L&T]	3289118513	Unit 2 B, Ground floor, 2 Kingdom street, Paddington Central, London- W2 6BD	Engineering service provider
5.	Ruletronics Limited [Subsidiary of Larsen & Toubro Infotech GmbH. Stake acquired on 15th March, 2019]	5282429360	Grenwhich London, 6, Mitre Passage, Greenwhich Peninsula, London- SE10 0ER	Provides technology consulting and digital solutions

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6.	Mindtree	Limited-	UK	9156507349	5th Floor, No.12, Art	nur Information	
	Branch			Street, London- EC4R9A	B Technology		
	[Mindtree	Limited	has			consulting	&
	become subsidiary of L&T					implementatio	on
	Limited on 2 <sup>nd</sup> July 2019]					company	
7.	Larsen & Tou	ubro Infote	ch	12073 21466	10 <sup>th</sup> Floor (North), 6 Be	evis Provides	
	UK Limited				Marks, London, UK, EC	3A technology	
	[Subsidiary o	of L&T Infot	ech		7BA	consulting	and
	Limited inco	rporated or	า			digital solutior	ns
	17 <sup>th</sup> August,	2020]					