

Velocity Trade International Limited

UK Tax Strategy

This document is intended to satisfy the reporting obligations of Schedule 19 of the Finance Act 2016 starting 1st January 2017. This document, approved by the board of Velocity Trade International Limited (“VTI”) sets out the Company’s approach to conducting its tax affairs and dealing with tax risks for the year ending 31 March 2022.

This tax strategy covers all active UK companies. The only active UK company is VTI, there is another UK company which is a 100% owned subsidiary (VTI Capital Limited) but it is currently dormant.

Introduction

VTI is a financial services broker-dealer authorised and regulated by the Financial Conduct Authority. VTI is a matched principal broker and deals predominantly with institutions such as other brokers, funds and corporates. VTI engages with top tier clearers, liquidity providers and platform technology to operate its business.

The Company is organised and operates with an awareness of corporate, social and environmental responsibilities. Our policies drive a values-based culture that serves to guide actions in the workplace so that daily activities are performed with honesty, integrity, dignity and respect and in support of VTI’s vision and values.

Tax Strategy

Our UK Tax Strategy is driven by these same values. This Tax Strategy paper is revisited annually by the Board.

VTI is committed to:

1. Following all applicable laws and regulations relating to its taxation and early adoption of the IFRIC 23 principles when disclosing “Uncertainty over income tax treatment”.
2. Maintaining an open and honest relationship with the tax authorities based on collaboration and integrity.

3. Ensuring that the tax strategy adopted is consistent with the Company's overall strategy.
4. Applying diligence and care in our management of tax risks and ensuring that our tax governance is appropriate.
5. Using incentives and reliefs to minimise the tax cost of conducting our business while ensuring that these reliefs are not used for purposes which are knowingly contradictory to the intent of the legislation.

1. Approach to risk management and governance

Tax risks are assessed on a case by case basis, allowing the Company to arrive at well-reasoned conclusions on how each individual risk should be managed. Where there is uncertainty in how the relevant tax law should be applied, external advice may be sought to support the Company's decision making process.

We are committed to strictly observe and adhere to all laws, rules, regulations and disclosure requirements in all jurisdictions in which we conduct business. We strive to use thorough professional care and judgement in all tax matters, ensuring decisions are taken at an appropriate level. We are committed to a conservative and low risk tax approach. Our internal structure operates to support compliance with tax laws and regulations in the UK and to ensure we identify, assess and mitigate tax risks. Internal controls are reviewed to confirm they are relevant and working effectively. We are committed to full compliance with our tax obligations. We will only adopt a filing position on the basis of a "more likely than not" external opinion or following prior consultation with HMRC where practicable.

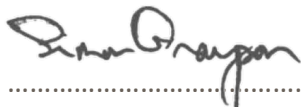
2. Attitude towards tax planning

We will only engage in tax planning that has a sound commercial basis. Appropriate tax planning will include taking advantage of specific government incentives. We aim to comply with all relevant laws, rules and regulations and carry out tax planning that supports our business goals. We seek external advice from qualified tax advisors in relation to tax planning or areas of uncertainty.

3. Approach towards dealings with HMRC

- The Company is committed to the principles of openness and transparency in its approach to dealing with HMRC, and in particular the Company commits to:
- Adopt open and collaborative professional relationships at all times with HMRC.
- Engage in full, open and early dialogue with HMRC to discuss tax planning, strategy, risks and significant transactions.
- Make fair, accurate and timely disclosure in correspondence and returns, and respond to queries and information requests in a timely fashion and to work with HMRC to rectify any omission in a full and prompt way.
- Seek to resolve issues with HMRC in real time and before returns are filed if possible, and where disagreements arise work with HMRC to resolve issues by agreement where possible.
- Be open and transparent about decision-making, governance and tax planning.
- Endeavour to ensure that transactions are structured to give a tax result which is consistent with the economic consequences and not to act in a manner that is contrary to the intentions of Parliament.
- Interpret the relevant laws in a reasonable way, and ensure transactions are structured consistently with a co-operative relationship.

Signed on behalf of VTI

A handwritten signature in black ink, appearing to read 'Simon Drayton', written over a dotted line.

Director

A handwritten signature in black ink, appearing to read 'A. Bano', written over a dotted line.

Director, Senior Accounting Officer