

## **GIP III Jupiter Investor TopCo Ltd – Tax Strategy**

### **Introduction**

This paper provides an overview of the tax strategy of GIP III Jupiter Investor TopCo Ltd (“**TopCo**”) and its wholly owned subsidiaries (together with TopCo, “**Investor Group**”), in accordance with Para. 19 of Sch. 19 to the Finance Act 2016 with respect to the calendar year ended 31 December 2020.

Investor Group consists of holding entities established to raise funding through issuance of share capital and debt instruments to finance holding activity. Investor Group’s holding activity consists of holding a 50% stake in a large offshore wind joint venture acquired from Ørsted Wind Power A/S.

The joint venture owns 100% of the issued share capital of Hornsea 1 Limited, a company set up to develop and construct a wind farm in the area known as Hornsea 1, located approximately 101km off the Yorkshire coast.

Investor Group entities have no employees. Required services are contracted from third parties.

### **Investor Group’s UK tax arrangements**

Each member of Investor Group is subject corporation tax. The lowest-tier entity (GIP III Jupiter Ltd) is VAT registered.

Investor Group is committed both to full and timely compliance with all applicable UK tax obligations, and to maintaining an open, transparent relationship with HMRC.

### **Investor Group’s approach to risk management and governance arrangements**

As noted above, Investor Group has no employees. Responsibility for Investor Group’s tax strategies sits with each member’s respective board of directors (the “**Boards**”). The Boards have reviewed and approved this paper. Investor Group has an obligation to act in the best interest of its shareholders. In addition, Investor Group also has a statutory obligation properly to account for tax consequences in its investments and operations. Accordingly, Investor Group seeks to ensure that it pays the right amount of tax that is due under a reasonable interpretation of the tax laws, thus meeting both its obligations as a taxpayer and its obligations to its shareholders.

Investor Group aims to meet its obligations in relation to UK tax through a risk management framework, key aspects of which include—

- Regular consultation with external advisors with the requisite skill and experience regarding compliance obligations; and
- An approach of transparent compliance and interactions with HMRC

### **Attitude towards tax planning**

Investor Group manages its tax affairs in support of its strategic and financial objectives. Investor Group does not endorse tax structures that are abusive or not supportable under the law and seeks to obtain the correct benefit of tax incentives, reliefs, and exemptions available under UK tax legislation. Investor Group obtains external advice in relation to its ongoing compliance and reporting obligations.

**Approach to tax risk**

Investor Group has a low tax risk appetite and seeks to mitigate risk as far as reasonably practical consistent with obligations to shareholders. Investor Group has the aim of achieving compliance whilst recognizing potential complexities in a capital intensive joint venture holding arrangement.

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