



ICS Terminals (UK) Limited

A wholly owned subsidiary of Triton International Limited

UK TAX STRATEGY FOR THE FINANCIAL YEAR ENDING DECEMBER 31, 2021

Statement pursuant to the United Kingdom Finance Act 2016, Schedule 19

ICS Terminals (UK) Limited (“Spacewise” or “the Company”) is a UK domiciled subsidiary wholly owned by the Triton International Limited (“TIL”) qualifying foreign group. The Company is publishing this statement pursuant to the requirements of the United Kingdom Finance Act 2016, Schedule 19, *Large Businesses: Tax Strategies and Sanctions*, paragraph 22. This statement is applicable to the tax strategy in the United Kingdom where the Company currently operates.

The Company’s overall tax strategy aims to support its business by maintaining an appropriate tax rate, while mitigating tax risks and complying with the rules and regulations of the United Kingdom and other jurisdictions. Listed below are additional elements of the Company’s tax strategy affecting UK taxation.

Spacewise’s risk management and governance arrangements in relation to UK taxation

The Company pursues a tax strategy that is sustainable in the long term based on the overall business strategies and objectives. The Company is committed to full compliance with all statutory requirements and obligations while maximizing shareholder value. The responsibility for the tax strategy, the supporting governance framework and management of tax risk ultimately sits with the Company’s Board of Directors in association with the CFO of TIL, who oversees the tax strategy for the TIL multinational group. Day-to-day responsibility for the tax strategy sits with TIL’s Director of Tax and VP Corporate Controller, who report to the CFO, with the assistance of external advisors. Compliance with established procedures is audited through annual certifications under US SOX standards as well as local UK accounting standards. All conduct of tax planning is subject to TIL’s Code of Ethics which requires the compliance with laws, rules and regulations.

The level of risk in relation to UK taxation that Spacewise is prepared to accept

The Company does not engage in tax arrangements, the sole purpose of which would be to obtain a tax advantage. The Company does, however, have a responsibility to minimize its tax obligations. The Company exercises reasonable care and due diligence in reviewing UK legislative, administrative and judicial guidance available for tax positions. The Company accepts some risk in taking tax positions favorable to the Company where this is in line with commercial objectives of the business and within the spirit and letter of the UK tax law.

Spacewise’s attitude towards tax planning

The Company engages in appropriate tax planning that supports its business and reflects commercial and economic activity. In order to grow its business, the Company must evaluate the impact of all

types of taxes. When making decisions on whether to enter into tax planning the Company ensures that the amount of tax paid is in compliance with relevant tax laws and is commensurate with the functions performed and risks borne in the relevant jurisdictions. The Company regularly consults with external advisors to navigate and plan for the complexities of existing or changing tax laws.

Spacewise’s approach towards dealings with Her Majesty’s Revenue and Customs

The Company seeks to comply with its tax filing, tax reporting and tax payment obligations globally. The Company will endeavor to respond timely and completely to requests for information from HMRC and to engage in open dialog towards resolution of any questions or issues as efficiently and openly as possible.

DECEMBER 22, 2020