



FirstBank UK Limited - Tax Strategy for the year ended 31 December 2022

Introduction

FirstBank UK Limited ('FirstBank UK' or 'the Bank') is a subsidiary of the First Bank of Nigeria Limited ('FirstBank'), an African bank with a rich heritage, established in 1894 as the first banking institution in Nigeria. FirstBank UK operates in the City of London with Representative Offices in France and Nigeria.

FirstBank UK's operations incur a variety of business taxes in the UK and in all the jurisdictions in which the Bank operates. FirstBank UK strives to be transparent and compliant in respect of taxation matters in all jurisdictions in which it operates. These include payments for corporation tax including banking surcharge, stamp duties, business rates and employment related taxes. The Bank also collect and pay employee related taxes and indirect taxes such as VAT.

This Tax Strategy is being published in accordance with Schedule 19 of the Finance Act 2016 (Large businesses: tax strategies and sanctions).

Governance Framework

FirstBank UK's Board of Directors ('the Board') have ultimate responsibility for its tax affairs.

The Board reviews and approves the Bank's Tax Strategy and Tax Policy Statement annually for update changes in tax legislation and or changes to the Bank's processes as and when required.

The Board delegates the responsibility for tax matters to the Chief Financial Officer ('CFO'), who delegates the day-to-day management of tax matters to Head of Finance, Head of Human Resources, Chief Representative Officer in France, and Nigeria Representative Office Accountant depending on the specific tax type, as set out in the Tax Policy Statement. The Tax Strategy applies and should be complied with by all staff throughout FirstBank UK including Representative Offices in France and Nigeria.

The CFO provide quarterly updates to the Board Audit and Risk Assessment Committee (BARAC) on tax affairs covering all jurisdictions that FirstBank UK operates.

The Financial Control Department, encompassing tax personnel and overseen by the CFO, are equipped with the appropriate knowledge, skills, and capability to manage the Bank's tax affairs.

The Bank uses reputable external tax advisors to provide technical insights and advice on tax compliance matters where required, examples of which include:

- when new or changes to existing tax laws and regimes arise;
- when the Bank executes complex financial transactions; and
- when the potential tax impact of a transaction is material.



Risk Management

The Bank operates a three line of defence model for risk management. The Board delegates the oversight of identifying risks and managing controls to mitigate risks, to the Chief Risk Officer ('CRO'). Tax risk considerations are duly considered in the Bank's risk architecture.

Key tax risks for the Bank include:

- failure to charge, withhold and pay the appropriate amount of tax on a timely basis; and
- failure to meet our tax reporting compliance obligations on an accurate and timely basis.

These key risks are mitigated by:

- reviewing the roles and responsibilities of the team, assessing any knowledge and skills gaps;
- engaging external advisors to address identified gaps;
- diligently monitoring and managing deadlines; and
- well-established review processes.

When a risk is identified, our process is to gain a deeper understanding of the identified risk and to then determine whether to tolerate or mitigate the risk depending on the potential impact and likely probability of reoccurrence.

In the event of discovering any inadvertent errors in tax filings submitted, the Bank makes full disclosure to the appropriate tax authority.

Acceptable level of risk

The Bank has a conservative appetite for tax risk. The Bank is not prescriptive in terms of the level of acceptable tax risk it undertakes, and each matter is assessed on its specific facts and circumstances, and within the Bank's governance framework.

FirstBank UK relies on the implementation of our Tax Strategy and Tax Policy to minimise our exposure to tax risk. We manage our tax affairs to ensure compliance with both the relevant tax laws and regulations, as well as the intention of Parliament and other governments in the tax jurisdictions in which we operate, and to ensure the appropriate amount of tax is paid in a timely manner.

Attitude toward tax planning

The Bank does not engage in tax planning other than that which supports genuine commercial activity. The Bank does not engage in highly aggressive or artificial transactions whose sole or main purposes is to generate a tax advantage. The Bank does not enter arrangements that would lead to a failure under Part 1 of HM Revenue & Custom's Code of Conduct. Whilst the Bank will make use of available reliefs and allowances for tax purposes, the focus is on the Bank's reputation and ensuring compliance with the law and its intention.



All transactions undertaken by the Bank are discussed with the Finance Team, and they consider the tax implications and provide approval, with appropriate support from external advisors as required. Tax compliance is embedded within its new product development process e.g., introduction of new products for customers is evidenced by the Project Review Committee and Executive Management Committee signs off.

Relationships with Tax Authorities

The Bank seeks to have an open and transparent relationship with the tax authorities in the different jurisdictions in which it operates. We do this by acting in an honest and constructive way in our dealings with them, including:

- seeking clarification in complex areas of tax law or when new tax laws are introduced;
- meeting deadlines;
- being proactive in sharing information on returns or omissions identified; and
- remaining available for questions as and when required.

List of entities covered by this Tax Strategy

FirstBank UK Limited