

Link Theory (UK) Ltd: UK Tax Strategy For the financial year ending 31 August 2018

Link Theory (UK) Ltd (“LTUK”) presents its UK tax strategy in accordance with Paragraph 16(2) of Schedule 19 of the Finance Act 2016.

LTUK is a UK-based, wholly-owned subsidiary of the Fast Retailing Co., Ltd. (“Fast Retailing”) group and is the sole wholesaler of Theory and Helmut Lang products across Europe. For the financial year ending 31 August 2018, this includes directly owned store operations in two European countries and wholesale sales to thirty five countries.

How LTUK manages our UK tax risks:

Our management has put in place a skilled team and a robust framework of controls suitable to manage the company’s tax risks in the UK. Specifically, this includes:

- recruitment of individuals to the finance team with appropriate skills and capabilities to ensure our tax compliance obligations are filed and paid accurately and on time;
- continued training of the finance team, with regular attendance at UK tax update sessions run by professional service firms;
- close working arrangements with external direct and indirect tax advisors in the UK;
- frequent correspondence and interaction with the Fast Retailing group global tax team;
- monitoring of tax risks and controls by the Finance Director (“FD”) in line with our Senior Accounting Officer certification;

The accountability for our tax strategy rests with our Chief Executive Officer (“CEO”), who sits on the Board of Directors. The CEO is consulted as necessary to review the risks and to approve changes to our processes designed to reduce our tax risks. The responsibility for implementing the tax strategy rests with our CFO, who leads the process of identifying and minimising tax risks in the UK arising from changes to the business structure, growth of the store and e-commerce portfolio, and of significant changes to accounting policies.

LTUK’s attitude to tax planning

In accordance with our Code of Conduct, LTUK aims to be compliant with all tax laws and regulations. We aim to file returns accurately and on time and we aim to pay the correct amount of tax in each of the countries we operate.

Where we do not have sufficient tax expertise either within the UK, Europe or within the group as a whole, we routinely request support from external direct and indirect tax advisors to assist us with tax compliance and tax reporting obligations.

Our company only engages in transactions that are an inherent, commercial part of our European retail business and that any decision is in line with our business strategy and falls within the overall risk appetite of the Group. Management decisions are taken after careful consideration of the all the issues and potential impacts, including operational, financial and reputation risks.

Tax is a business expense which needs to be managed, like any other. We therefore seek to make use of government sponsored incentives and reliefs to reduce our tax cost while ensuring that these reliefs are not used for purposes which are knowingly contradictory to the intent of the legislation

LTUK's willingness to accept tax risk

Our CEO and CFO are ultimately responsible for the level of tax risk which LTUK is willing to accept; however the group does not have defined levels of acceptable tax risk. The prevailing attitude of the Fast Retailing group as a whole is to be fair and consistent in dealing with tax authorities around the world.

LTUK's Board is striving to create and build a sustainable business model within the UK and Europe. Therefore, management has a low appetite to accept tax risks and see it as a hindrance to the successful operation and growth of the business.

Where uncertainty or complexity exists in the interpretation of tax law, then we may seek external tax advice or engage directly with Her Majesty's Revenue & Customs ("HMRC").

How LTUK works with HMRC

Our approach to working with HMRC is focussed on openness, honesty and clear communication. Where new tax risks have been identified in the past, we have engaged with HMRC proactively, in order to reach agreement on the tax position in advance of undertaking the related transactions.

We are committed to ensure full compliance with all statutory obligations and to maintaining a positive working relationship with HMRC, undertaken in a spirit of cooperative compliance.

Approved by the Board of Directors
30 August 2018