

Duke Oil Services (UK) Limited Tax Strategy

This document sets out the Duke Oil Services (UK) Limited (“Duke”) strategy for conducting its tax affairs and managing its tax risk for the year ended 31 December 2018. This strategy has been approved by the directors of Duke and will be reviewed annually.

Duke is a wholly owned subsidiary of the Nigerian National Petroleum Corporation (“NNPC”), providing administrative services to other companies within the NNPC group. Duke is incorporated and is tax resident in the United Kingdom.

Duke has undertaken a review of its tax procedures and now publishes its tax strategy in accordance with measures contained in Schedule 19 of Finance Act 2016.

Our Approach to Tax

Duke is fully committed to complying with all UK tax law and pays the required UK taxes. Duke aims to pay all taxes due and file all relevant tax returns and documents accurately and in a timely manner.

The NNPC group policy is to comply with all relevant rules, regulations and disclosure requirements, as imposed by the appropriate tax authorities such as HMRC.

Governance and Management of Tax Risk

The UK tax affairs of Duke are managed by its Finance Team, with the Duke Managing Director having overall responsibility for the management of tax risk.

The Board of Duke, updated as appropriate by the Managing Director, exercises oversight of tax risk management and governance primarily through discussions at the Board meetings. No areas of concern in respect of tax matters were identified by the Board in the year to 31 December 2018.

Suitably qualified external advisors prepare and file tax returns and also advise on areas of uncertainty or changes in the legislation relevant to Duke.

Attitude towards tax planning

Duke does not undertake any transactions beyond those that are for purely commercial reasons and does not engage in any tax planning which could lead to any abusive results.

Duke will seek to utilise UK tax reliefs and incentives, where available to obtain tax efficiencies within the business. However, such reliefs and incentives will be utilised in a manner which is consistent with the underlying government objective.

Duke did not undertake any tax planning in the year ended 31 December 2018.

Level of risk in relation to UK taxation

Duke seeks to manage its tax affairs so that tax risk is low. The tax risk is mitigated through a combination of robust compliance processes and seeking professional advice on the tax impact of any changes to the business, or the business environment.

Approach towards dealings with HMRC

Given the nature of Duke's activities and its size, the relationship with HMRC is compliance focussed. Duke ensures that, where necessary, it provides sufficient and appropriate documentation or disclosure to HMRC.

It has not been necessary for Duke to make any disclosures to HMRC in the year ended 31 December 2018.

Professional advisors act for Duke to ensure UK tax compliance matters are dealt with in a timely and correct manner. Our advisors communicate with HMRC on behalf of the company to the extent required.

Should any tax issues arise in the future, Duke would seek to resolve these through transparent and open discussions with HMRC in a timely manner.

Country by country reporting

Duke supports the UK Government's adoption of the OECD's Base Erosion and Profit Shifting recommendations, including the requirement to submit country-by-country tax reports to HMRC. Duke will comply with this obligation.

Corporate Criminal Offence for failure to prevent criminal facilitation of tax evasion

Duke's Board of Directors are aware of the new Corporate Criminal Offence rules in respect of the facilitation of tax evasion introduced by the Criminal Finance Act 2017. The Board are committed to complying with these rules and are in the process of undertaking a bespoke risk assessment to identify the business' risks, and areas where additional prevention procedures are required.