BL Harbert International LLC – Group Tax Strategy
The publication of this strategy statement is regarded as satisfying the statutory obligation under Para 16(2), Schedule 19, Finance Act 2016.

Approach of the Group to Risk Management and Governance Arrangements
BL Harbert International LLC ("BLHI", "we" or the "Company") is committed to complying with the tax laws and practices in all the countries in which it operates, including the United Kingdom. Responsibility for tax strategy and risk is ultimately born by the Chief Financial Officer. Day-to-day responsibility for tax compliance belongs to the Chief Compliance Officer.

BLHI's Standards of Business Conduct set out what is expected of every employee and our approach to tax aligns with such Standards and is approved, owned and overseen by the Company's Board of Directors.

Attitude of the Group Towards Tax Planning
BLHI recognizes that it has a responsibility to pay an appropriate amount of tax in the countries in which it operates. At the same time, it balances this with the responsibility to its stakeholders to arrange its affairs in an efficient manner.
Any planning BLHI engages in must not adversely affect its reputation or harm its relationship with the tax authorities. BLHI will not undertake planning that is contrived or artificial.

Level of Risk in Relation to UK Taxation that the Group is Prepared to Accept
Given the scale of our business and volume of tax obligations, risks will inevitably arise from time to time in relation to the interpretation of tax laws and the nature of our compliance arrangements. BLHI proactively seeks to identify, evaluate, manage and monitor these risks to ensure they remain in line with the Company's risk appetite. Where there is significant uncertainty or complexity in relation to a risk, external advice may be sought.

Approach of the Group Towards its Dealings with HRMC
BLHI engages with tax authorities, including HMRC, with honesty, integrity, respect and fairness and in a spirit of cooperative compliance. We are prepared to litigate where we disagree with a ruling or decision of a tax authority but will first seek to resolve any disputed matters through pro-active and transparent discussion and negotiation.
BLHI's goal is to have professional and constructive relationships and maintain transparent disclosure in our relationships with tax authorities, recognizing that early resolution of risks is in the best interests of the Company and such tax authorities.

210 London Parkway Birmingham, Alabama 35211 PHONE 205-802-2900 FAX 205-802-2901