



ABM International (Holdings) Limited Tax Strategy

This document sets out the tax strategy of ABM International (Holdings) Limited and its UK subsidiaries (UK Group) in accordance with Schedule 19 of the Finance Act of 2016. The UK Group's companies are listed at the bottom of this document.

The tax strategy applies to all UK taxes applicable to the UK Group. ABM Industries Incorporated (ABM), the ultimate parent company of the entities which comprise the UK Group, is a public company organized under the laws of the State of Delaware in the United States and whose shares are listed on the New York Stock Exchange. ABM adheres to the corporate governance standards set forth in its Corporate Governance Principles which are available on its website. The tax strategy is further informed by the principles set forth in our Code of Business Conduct which describes not only our core values of Respect, Integrity, Collaboration, Innovation, Trust and Excellence but is also a key part of our vision to lead the industry in the delivery of integrated facility service solutions.

The Board of Directors of ABM International (Holdings) Limited (Board) has approved the tax strategy. The Board will regularly review the strategy and monitor compliance with the strategy. The finance teams in the UK Group along with the ABM's head of tax will be accountable to the Board for the implementation of the tax strategy and management of tax and the related tax risks.

UK Group's Governance and Risk Management

The UK Group's tax governance and risk management is managed in accordance with the standards set by the Board. These standards include compliance with all tax laws. The tax strategy of the UK Group includes the maintenance of internal controls which are informed by the principles of the Sarbanes-Oxley Act.



Day-to-day management of the tax affairs of the UK Group are managed by the local UK finance teams. They engage UK legal firms and accounting firms as necessary to provide technical and compliance support. ABM's head of tax has oversight as to the UK Group's tax affairs. ABM's head of tax reports to the Corporate Controller who reports to the Chief Financial Officer.

The UK Group has a system of tax risk assessments and controls which are a component of the overall internal controls on the financial reporting system and tax compliance reporting. Processes related to different taxes are completed by appropriate tax process owners, who review processes for completeness and accuracy, in addition to identifying key risks and insuring that mitigating controls are in place. Risks are monitored for business and legislative changes which could impact the process or the associated control. Training is provided to the tax team and external advisors are consulted where necessary.

UK Group's attitude to tax planning and level of risk

The UK Group will not engage in artificial transactions having the sole purpose to reduce UK tax. However, the UK group will consider transactions that give rise to UK tax efficiencies providing they are aligned with the UK Group's commercial and financial objectives and comply with UK tax legislation.

The UK Group manages risks to ensure compliance with legal requirements in order to ensure payment of tax due. The level of risk which the UK Group accepts is consistent with its overall objective of achieving certainty in the group's tax affairs. The UK Group seeks to make timely and complete tax filings along with full disclosure to HMRC in order to maintain its reputation as a responsible corporate taxpayer.

Relationship with HMRC

The UK Group aims to have an open and constructive relationship with the tax authorities in those countries in which it has a presence. Any errors in



submissions made to HMRC are fully disclosed as soon as reasonably possible after they are identified. The UK Group has had contact with HMRC when the UK Group requested and received treaty clearance on certain interest payments to lenders.

List of Entities

NAME OF CONSTITUENT ENTITY
ABM International (Holdings) Limited
ABM Group UK Limited
ABM Facilities Services UK Limited
BRBIBR Limited
ABM Critical Solutions Limited
ABM Aviation UK Limited
OFJ Connections Limited
OFJ Airlinks Limited
Westway Services Holdings (2014) Limited
Westway Services Holdings (2010) Limited
ABM Technical Solutions Limited