

NORWEGIAN TAX STRATEGY

This strategy statement is regarded as satisfying the UK statutory obligation under Para 16(2), Schedule 19, Finance Act 2016 for all companies listed at Appendix 1 and has been approved by the Board of Directors of Norwegian Air Shuttle ASA.

1 INTRODUCTION

Norwegian is the sixth largest low-cost carrier in the world with around 7,000 dedicated colleagues. Our customers can choose from around 500 routes to more than 150 destinations in Europe, North Africa, the Middle East, Asia, the Caribbean, South America and the US.

The tax strategy of the company is to support Norwegians business decisions and ensure their proper implementation from a tax perspective.

Norwegian is a responsible taxpayer, which approach to tax matter is to act in a professional manner, be transparent and observe all applicable laws, rules and regulations as well as OECD Transfer Pricing Guidelines in meeting our tax compliance and reporting responsibilities everywhere we operate.

Norwegian's objective for corporate governance is based upon accountability, transparency, fairness and simplicity. The principles are designed in compliance with laws, regulations and ethical standards, hereunder Norwegian's [Code of Ethics](#). The Head of Group Tax and Transfer Pricing owns the tax strategy and is responsible for its implementation.

2 GOVERNANCE AND TAX RISK MANAGEMENT

Norwegian actively seek to identify, evaluate, monitor and manage tax risks. Procedures are put in place to identify, quantify and mitigate tax risks. Norwegian is focused on ensuring that tax risks are handled to provide sustainable outcomes within the parameters of Norwegian's strategic and commercial objectives. Material tax risks are reported to the CFO, group management, audit committee and board of directors regularly.

Where there is significant uncertainty or complexity in relation to a risk, external advice is regularly sought, particularly in relation to significant transactions, reorganizations and entering new markets.

Where appropriate we engage with tax authorities to disclose and resolve issues, risks and uncertain tax positions. The subjective nature of many tax rules does however mean that it is often impossible to mitigate all known tax risks. As a result, at any given time, Norwegian may be exposed to financial and reputational risk arising from tax affairs.

3 TAX PLANNING

Tax planning is the analysis of a financial situation or plan from a tax perspective. The purpose of tax planning is to ensure operational efficiency, avoid double taxation and tax compliance, and to align tax planning with the business/financial plan in the most tax-efficient manner possible.

All advice on tax planning is given within Norwegian's tax policy on tax planning / tax advice. This means that all transactions must have a sound legal and commercial basis. This excludes the implementation of any artificial tax scheme.

4 RELATIONSHIP WITH TAX AUTHORITIES

Norwegian engage with tax authorities, including HMRC with honesty, integrity, respect and fairness and in a spirit of co-operative compliance.

In case of unclear application of tax law, Norwegian will seek proactive feedback from tax authorities.

Whilst we will not take aggressive positions on tax matters, we are however prepared to litigate where we disagree with a ruling or decision of a tax authority, having always first sought to resolve any disputed matters through active and transparent discussion.

APPENDIX 1 – UK GROUP COMPANIES

NORWEGIAN AIR UK LIMITED
NORWEGIAN OSM UK LTD
NORWEGIAN OSM AVIATION LH UK LIMITED
RED HANDLING UK LIMITED