



WillScot Mobile Mini Holdings Corp UK Tax Strategy Publication

Introduction

This policy statement covers the Mobile Mini UK operations of WillScot Mobile Mini Holdings Corp (“WMMHC”) for 31 December 2022 and is intended to satisfy the UK tax strategy publication requirement under Schedule 19 to the Finance Act 2016. Mobile Mini UK is part of a UK-subgroup as defined under Schedule 19(2).

Our Company and Business

Mobile Mini and the company’s roots run deep in the UK’s portable storage and accommodation industry, with some of our predecessor companies having been founded in the early 1970’s.

Today, we have a national network of 15 sites with over 40,000 portable units which provide site accommodation and secure storage solutions to approximately 17,300 customers including construction companies, retailers, manufacturers, hospitals, schools, utility companies, distributors, local and national government, hotels, restaurants, entertainment and shopping complexes and individual households to name but a few.

Approach to Tax Planning

The tax strategy of Mobile Mini UK is to comply fully with UK tax laws whilst aligning our tax planning with business objectives to create and protect shareholder value in a tax efficient manner. Any tax planning undertaken by the Mobile Mini UK seeks to reflect the commercial realities of our dynamic business operations. In order to carry out the Mobile Mini UK strategy we partner with the business divisions, 3rd party advisors and management to ensure they are supported and advised of potential tax costs, benefits and risks of proposed and executed transactions. Additionally, we will ensure the appropriate information is obtained to fully discharge Mobile Mini UK’s compliance requirements. We will, claim properly available allowances, deductions, reliefs, credits and incentives in conjunction with our tax planning, whilst complying with HMRC guidance and legislation.

We provide this support to the businesses by recruiting sufficient, highly trained, experienced staff specializing in both tax and finance matters. We are committed to conduct our tax affairs to the highest standards and in line with the WMMHC Code of Conduct and to comply with all applicable anti-bribery, money laundering and anti-tax evasion legislation. We foster an open, honest and constructive relationship with tax authorities whom we deal with. We strive to ensure that all filing positions are supported by strong technical grounds and, where clear, in the spirit of what the law is understood to have intended. Such positions will be robustly defended if challenged.

Managing Tax Risk

The WMMHC pro-actively manages, reviews and reports on tax risks and employs an experienced tax team, primarily based in the US & UK, which is part of the central finance function reporting to the Chief Financial Officer.



The Mobile Mini UK finance department is accountable for day-to-day management of tax matters, unless accountability is clearly devolved and accepted elsewhere. Any decisions to be made in respect of uncertain tax issues will be subject to diligent professional care and judgement by the tax group, but also after consulting with and justifying the decision with local and international management teams. In those situations where the level of uncertainty is high the tax group will utilize outside advisors to help evaluate the risks.

The Audit Committee of the Board of Directors of WHMMC receives a regular report as to material changes in tax legislation that may impact the Mobile Mini UK as well as details of uncertain tax positions. In the rare case of significant material issues arising, these issues will be presented to the full Board of Directors of WMMHC Corporation by the Head of Tax.

Tax Risk Appetite

Despite following the above principles it is inevitable, in such a fast changing international environment, that there will be instances where there is a degree of uncertainty and hence tax risk in relation to transactions or activity.

Tax advice will be sought from external advisors in relation to material uncertain transactions or where the tax department does not have the level of expertise required in a particular area. Any tax opinions received are an aid to, not a replacement for, professional judgement to be exercised by the team. Where appropriate, best practice solutions will be sought or such issue may be discussed with the tax authorities, as the best way to avoid costly disputes is to reach a consensus on issues in advance. Filing positions not supported by a strong technical position are not adopted.

Working with HM Revenue & Customs (HMRC)

The Mobile Mini UK aims to foster an open and constructive relationship with HMRC. We will engage in advance of material commercial transactions, or soon thereafter, where there are areas of material uncertainty as to the correct tax treatment.

Approval for this Statement

This statement is approved by the Mobile Mini UK Board of Directors.