

UK TAX STRATEGY

UK Tax Strategy

At Datacom, we help organisations and communities to a better place by connecting people and technology in the United Kingdom and every country we operate in around the world.

Datacom's collective efforts every day, every week, every month, every year have an impact on the many businesses, governments and communities we serve, making their respective worlds increasingly better. Helping organisations and communities to a better place is our contribution to tomorrow through the work we do connecting people and technology.

The following statement sets out the tax strategy of Datacom in the UK in accordance with the provisions of section 19(2) of Schedule 19 Finance Act 2016 and relates to our financial year ended 31 March 2020. This tax strategy applies to Datacom's presence in the UK, which is through a locally incorporated company for which Datacom Group Limited is the ultimate parent company. Datacom's tax governance and tax risk management responsibility rests with the Groups Audit Committee and our Chief Financial Officer (CFO), while day-to-day responsibility is delegated by the CFO to the Group Tax Manager.

Approach to risk management

Datacom is committed to conducting its tax affairs in accordance with the following principles:

- To comply with all applicable legislation, regulations, reporting and disclosure requirements in the countries in which it operates.
- Ensure that the tax strategy is in accordance with the wider Datacom Group's overall strategy, and its approach to risk.
- Apply professional due diligence and care in the management of tax matters and ensure governance procedures are appropriate.
- To ensure that tax risks are considered as part of the assessment of any significant transaction or project.
- Use of tax incentives and reliefs, where permitted by law.
- To proactively communicate regularly with the Audit Committee and the Group CFO on appropriate tax matters.
- To protect Datacom's reputation in relation to tax matters.
- Ensure that Datacom's global Code of Conduct, which sets out standards of behaviour that every person conducting business for the Datacom Group must follow. This commitment is equally applicable to tax and is underpinned by the principles mentioned in this Tax Strategy.
- Ensure that tax risk is actively managed, to ensure strong controls are in place and there is regular monitoring.

Attitude to tax planning and level of risk

We interpret UK tax law in a reasonable, non-aggressive manner taking into account both the purpose and intent of the applicable law. We seek external professional guidance on any uncertain or contentious matters as and when they arise. Where applicable to our business circumstances, we will seek to apply UK tax incentives and exemptions in the manner in which they are intended.

We conduct business with honesty, integrity and in compliance with applicable laws and regulations. The Datacom Group, including Datacom UK, has a low tax risk appetite which is supported by the Datacom Group's senior leadership and Board of Directors. Datacom utilises qualified and experienced internal tax professionals in conjunction with our external global tax advisors to identify uncertainties and ensure tax

risks are assessed and addressed appropriately. The Audit Committee of Datacom Group Limited's Board of Directors provides regular oversight of tax matters, along with the full Board as appropriate.

Where a tax opinion is sought, no position will be adopted unless it is supported by at least a should opinion. Relevant considerations that Datacom takes into account when evaluating its UK and global tax risk profile include, but are not limited to, the quantum of tax concerned, local and international tax authority guidance (if applicable), potential reputational damage and impacts on relationships with HMRC ("HM Revenue & Customs") and other stakeholders.

Approach to dealings with tax authority, HMRC

Datacom is committed to maintaining an open, proactive, professional and transparent relationship with the local tax authority, HMRC. Where necessary, we will seek formal or informal clearance from HMRC on uncertain tax positions insofar as they relate to our tax affairs.