



Computacenter PLC Group Tax Strategy

Computacenter is one of Europe's leading independent providers of IT infrastructure services, enabling users and their business. Computacenter advises organisations on their IT strategy, implementing the most appropriate technology and optimising its performance, as well as managing its customers' infrastructures. In doing this Computacenter helps CIOs and IT departments maximise productivity and the business value of IT for their internal and external users.

Computacenter's approach to tax is aligned to one of the core values of the Group – being straightforward. The primary goal of Computacenter's tax strategy is to ensure that the correct tax is paid at the correct time, and that all tax laws are adhered to. A strong, proactive and transparent working relationship with all tax authorities that the Group engages with is a key objective of the Group's tax strategy.

Tax governance

The Group's tax strategy is reviewed and approved annually by the Board. The Board has delegated the responsibility for the execution of the strategy to the Group Finance Director who communicates with and advises the board on the tax affairs of the Group.

The Group Financial Controller has ownership of the Group's tax operations and oversight of tax risk. Operational process and the detailed analysis and preparation of the tax records is the responsibility of the Group Head of Tax and Treasury, who is responsible for managing the Group Tax Team.

The tax responsibilities of the Group Finance Director, Group Finance Controller and Group Head of Tax and Treasury include:

- Regular communication with the Board regarding management of material tax risks and issues;
- Reviewing any significant transactions; (e.g. acquisitions, disposals, financing arrangements);
- Approving external advisor appointments;
- Monitoring adherence to the Group's tax strategy;
- Approval of tax disclosures for the Group's financial statements;
- Approval of tax returns; and,
- Ensuring accounting systems and controls calculate and report accurate and timely information for tax reporting purposes, which includes, but is not limited to, enabling the UK Senior Accounting Officer to provide the certification required by Schedule 46 Finance Act 2009.

Attitude towards tax planning

The Group ensures that the structure of any significant transaction is reviewed by the tax team so that tax interpretation is dealt with up front to ensure an effective and tax compliant structure is selected where options exist. The Group's business needs will be the primary driver for the organisation of transactions or business lines, and the tax team will review the tax implications of alternative options. Where necessary, external tax advice will be sought to ensure the commercial requirements of the business are properly aligned to the relevant tax legislation and documentation requirements. The primary purpose for the Group to review tax issues is to ensure that tax risks in transactions are managed effectively, and that the Group can realise Government driven incentive schemes as they were intended to be used. Examples of such planning activities are ensuring that cross-border transactions are correctly aligned to the relevant BEPS driven legislation, or that qualifying expenditure is correctly identified for R&D credits.

Management of and attitude towards tax risks

The Group's tax strategy is to take appropriate care so that the correct amount of tax is paid at the correct time. The Group does not set permissible levels of acceptable tax risk. In 2008, HMRC awarded Computacenter (UK) Limited a low risk status. It is the intention of Computacenter (UK) Limited's management to maintain its low risk status with HMRC as this is congruent with the Group's approach to its tax strategy.

The Group considers and manages its tax risks across three specific areas:

Transactional tax risk – This concerns risks and exposures associated with specific transactions undertaken by the Group. The first stage of managing and mitigating the transactional tax risk involves proactive identification of the transaction to the Tax team. The Finance department adopts a partnership approach when working with other business areas, and as a result, new transactions are routinely identified to the Tax team so that the tax risk can be considered and managed. Material transactions require the approval of the Finance Director who will ensure that the tax risk associated with a transaction is understood and managed. The Schedule of Matters Reserved for the Board requires that all significant transactions which affect the Group's strategy, structure, financing and contracts are properly addressed and approved by the Board of Directors. Included as part of this process is ensuring that any tax risks involved with the transaction are understood fully. For transactional tax risk analysis, a process of first reviewing and documenting the tax impact of a transaction is carried out by the in-house tax team. If the in-house tax team consider that sufficient uncertainty still exists then external advice will be sought to ensure any risk is appropriately managed.

Operational tax risk – Operational tax risk concerns the underlying risk of applying correctly the tax laws, regulations and decisions to the routine daily business operations of the company. Computacenter maintains an up-to-date knowledge of the tax landscape in which the Group operates. This is achieved through a combination of ensuring the in-house tax team has access to training and legislative updates, and that a network of external tax advisors is in place with a good

knowledge of the Group's business. This ensures that relevant tax developments which impact Computacenter can be understood and managed.

Compliance tax risk - The Group Head of Tax and Treasury is responsible for ensuring that the tax team has appropriate resource and technical knowledge to meet the Group's compliance obligations. An annual review process is used to identify any training requirements. External resource is engaged if in-house knowledge is not sufficient to meet a compliance requirement adequately.

Working with tax authorities

The Group maintains an open and honest relationship in its dealing with local tax authorities and will seek to work in partnership, including:

- In the event of any inadvertent error(s) arising, full disclosure, will be made;
- The Group will disclose any relevant planning it undertakes in line with the legal disclosure requirements and criteria set out by the tax authority;
- Where appropriate, the communication routes will have been agreed with the tax authority; and
- The Group will continue to meet and cooperate with the tax authority to facilitate a mutually beneficial relationship.

Computacenter values HMRC's approach to assigning a Customer Compliance Manager (CCM) and has found this to be positive in proactively discussing and resolving tax issues. Computacenter will continue to engage the CCM to maintain a mutually beneficial relationship with HMRC.

UK compliance statement

Computacenter's tax strategy is set at a group level so that a consistent approach is taken to managing tax across the Group. Computacenter considers that the publication of its Group Tax Strategy complies with the UK requirements under paragraph 162(2), Part (2), Schedule 19, Finance Act 2016 to publish a tax strategy. All aspects of the Group Tax Strategy are applied to the risk management and governance of UK taxes, the attitude towards tax planning insofar as it affects UK taxes, the level of risk in relation to UK taxes which Computacenter is prepared to accept and the approach of Computacenter towards its dealings with HMRC.

Approval of the Group tax strategy

The Computacenter Group Tax Strategy document was approved by the Board of Computacenter PLC on the 7th December 2022.