

# Computacenter PLC Group Tax Strategy

Computacenter is a leading independent technology and services provider, trusted by large corporate and public sector organisations. We are a responsible business that believes in winning together for our people and our planet.

We help our customers to Source, Transform and Manage their technology infrastructure to deliver digital transformation, enabling people and their business.

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 tax strategy to the Group CFO who 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 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 CFO, 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 significant transactions are reviewed by the tax team so that tax interpretation is dealt with upfront to ensure an effective and tax compliant structure is selected. 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 Group will review transactions to ensure that tax risks are managed effectively, and where applicable, that the Group can realise Government driven incentive schemes as they were intended to be used. Examples of tax planning activities are ensuring that cross-border transactions are correctly aligned to the relevant OECD 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 not correctly interpreting and applying tax legislation to transactions undertaken by the Group. Material transactions require the approval of the Group CFO 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 fully understood and managed. Transactional tax risk analysis is carried out by the Group tax team. If the Group tax team consider that sufficient uncertainty exists then external advice will be sought to ensure any risk is appropriately managed.

Operational tax risk — Operational tax risk concerns the risk of not correctly applying tax laws, regulations, and internal tax decisions to the routine daily business operations of the company. The tax team maintains an up-to-date knowledge of the tax rules governing the jurisdictions that the Group operates in through a combination of training, legislative updates and a network of external tax advisors which understand the Group's business. Group systems and processes are used to apply the correct tax treatment to the operations of the Group.

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. Workflow tools are used to manage the completion of compliance obligations. External support is engaged if in-house resource is not available to meet a compliance requirement.

#### 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 6<sup>th</sup> December 2023.