

DLA PIPER UK LLP - UK TAX STRATEGY

Scope

This document sets out the strategy of DLA Piper UK LLP in relation to its UK tax affairs and has been produced to comply with the provisions of Schedule 19 Finance Act 2016. In this document, DLA Piper UK LLP will be referred to as "DLA Piper" or "the firm".

This UK tax strategy has been approved by and is owned by the Board of DLA Piper, who have responsibility for monitoring its application. The Board is assisted in this regard by the firm's Tax and Audit Committees.

Governance

DLA Piper manages its tax affairs in a way that is consistent with its overall high standards of governance.

- Ultimate responsibility for DLA Piper's UK tax strategy and compliance rests with its Members. The Members of DLA Piper delegate management of these issues to the Board of DLA Piper.
- The Chief Financial Officer ("CFO") is charged by the Board with responsibility for tax matters;
- The firm operates a Tax Committee that provides support, direction and oversight to the CFO in respect of tax compliance risks and tax strategy. The Tax Committee is made up of appropriately experienced and/or qualified individuals. The Tax Committee reports to the Audit Committee during the year, which in turn, reports on those tax risks and strategy to the Board. Two members of the Tax Committee are members of both the Board and the Audit Committee ensuring consistency of reporting.
- Day-to-day management of the firm's tax matters are delegated to appropriately experienced and/or qualified staff.

Management of tax risks

The evaluation and control of DLA Piper's tax risks is carried out within (and as part of) DLA Piper's internal framework that has been put in place to evaluate and control financial reporting. DLA Piper has processes which ensure compliance with tax reporting obligations.

So far as is reasonably practicable, DLA Piper actively seeks to identify, control and minimise tax risks across all of its different tax processes.

All individuals who are responsible for DLA Piper's tax processes are appropriately qualified and experienced. Individuals are allocated to review activities and processes relating to different taxes based on their specialisms. This allows key risks to be monitored for legislative changes and the associated implications for the business to be reviewed.

For tax matters requiring additional and specialised knowledge, the in-house tax team engage suitably qualified legal and accountancy firms or other consultants with specialised knowledge of taxation.

Where necessary, the in-house tax team will seek guidance from HMRC through clearances on complex issues where the tax position is uncertain.

Attitude to tax planning and level of tax risk

DLA Piper manages its tax affairs to ensure that it complies with legal requirements and pays the amount of tax required by law.

DLA Piper seeks to adopt a responsible attitude towards structuring its business and regards adherence to and compliance with tax requirements as critical.

DLA Piper seeks to take advantage of available tax reliefs, exemptions and incentives in line with tax legislation but does not undertake tax planning unrelated to DLA Piper's commercial transactions. DLA Piper does not put in place any arrangements that are contrived or artificial.

The level of risk that DLA Piper accepts in relation to UK tax is consistent with its overall objective of obtaining certainty in its tax affairs.

Working with HMRC

DLA Piper seeks to have an open and constructive relationship with HMRC and considers this to be critical to the management of its tax affairs.

DLA Piper seeks to maintain a low risk rating with HMRC. DLA Piper does this by conducting its relationship with HMRC in such a way as to mitigate and minimise tax risk, actively engaging with HMRC and keeping HMRC informed of key transactions and changes in its business. DLA Piper regularly invites HMRC to meet with it so that the firm can explain its business and discuss any changes or issues with HMRC.

DLA Piper communicates with HMRC in a transparent and collaborative manner, wherever possible discussing tax matters with HMRC in advance. When providing HMRC with information, DLA Piper discloses all relevant facts and highlights areas where there is scope for alternative tax treatments.

DLA Piper would expect to engage in open and frank discussions with HMRC to resolve any dispute although it is prepared to defend its position where it disagrees with HMRC decisions.

APRIL 2019