

## **Our approach to Tax: UK**

**June 2024**

**This statement applies to Computershare Limited<sup>1</sup> and all UK entities and branches in its group for the financial year ended 30 June 2024**

### **1) About the business**

Computershare (ASX: CPU) is a global market leader in transfer agency and share registration, employee equity plans, proxy solicitation and stakeholder communications. The Company also specialises in corporate trust, mortgage, bankruptcy, class action and utility administration and a range of other diversified financial and governance services.

Founded in 1978, Computershare is renowned for its expertise in high integrity data management, high volume transaction processing and reconciliations, payments and stakeholder engagement. Many of the world's leading organisations use Computershare to streamline and maximise the value of relationships with their investors, employees, creditors and customers. In the last 45 years, Computershare has listed on the Australian Securities Exchange, expanded into over 20 countries, diversified into new sectors and now employs over 12,000 people worldwide.

In the UK, Computershare engages in a number of business activities, including those that involve accepting a fiduciary responsibility to clients and third parties.

### **2) Commitment to compliance**

Computershare is committed to meeting its tax obligations in all territories, including the UK, in relation to its business operations.

In the UK, the primary objectives are to ensure compliance with UK legislation and to ensure that Computershare has sufficient controls and processes in place to accurately report and pay its tax liabilities. This involves working with advisors where necessary and disclosing relevant facts and circumstances to the tax authorities as appropriate, particularly where there are areas of uncertainty or complexity.

### **3) Arranging our tax affairs**

Tax is one of a broad range of commercial factors taken into account when Computershare assesses and undertakes any investment activity.

The tax risk attaching to any transaction / investment notified to the tax function is always considered carefully by Computershare and is factored into every material commercial decision. All tax planning is required to align to commercial substance.

In structuring Computershare's commercial activities, consideration is given to, among other factors, the tax laws of the countries in which operations are undertaken, with a view to ensuring compliance for both Computershare and its clients.

### **4) Tax risk management**

Given the nature of Computershare's business and complexity of tax law, from time to time the group is exposed to tax risk.

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<sup>1</sup> Computershare Limited in this context is the listed Australian parent of the group and not the UK company of the same name that holds some but not all of the UK group

Computershare has a tax governance framework which has been approved by the Board of Directors of the Group's parent company, Computershare Limited. Tax risk is also managed pursuant to documented policies, which where relevant, have been adopted by the Board of Directors of UK entities. The Group accept a low level of tax risk.

### ***Roles and Responsibilities***

Tax falls under the oversight of the Global Risk and Audit Committee who provide assistance to the Computershare Limited Board in fulfilling its responsibilities with regards to corporate governance worldwide and will consider and advise upon tax issues and tax risk management issues brought before the Board.

Below Board level, the Global Head of Tax, who is based in the UK, is responsible for managing tax risk with the support of the Group Tax team.

### ***Tax Risk Approach***

Controls and processes are implemented to ensure that all known tax liabilities due under UK law are correctly recorded, accounted for and paid. Strong emphasis is placed on robust Tax Corporate Governance and meeting the objectives set out in the Group and Regional Tax Policy documents.

The Global Head of Tax (with assistance from Global Tax team personnel) is responsible for the identification and management of tax risk attaching to general corporate activities and business transactions notified to the Global Tax team. Assessment is made of the consequence, likelihood and control adequacy on all significant UK risks which are tracked, monitored and notified as appropriate to the Global Head of Tax and Group CFO, and ultimately, to the Risk and Audit Committee, the Board of Computershare and where necessary, the Board of the relevant UK entity.

## **5) Engaging with HMRC**

Computershare has a strong history of compliance and seeks to engage with HMRC with honesty, integrity, respect and fairness.

The Global Tax Team seeks to foster a strong relationship with HMRC in order to properly manage UK tax risk and ensure compliance.

Due to the nature of Computershare's business and the scale of the Group's subsidiary structure around the globe, Computershare's business operations can be complex. Computershare has on occasions sought tax clearances on various matters from HMRC and has had dealings with some of their technical experts where appropriate.

Whilst Computershare will not take positions on tax matters that may create reputational risk or jeopardise its relationship with tax authorities, where Computershare disagrees with a ruling or decision of a tax authority, the Company will seek to resolve any disputed matters through active discussion. Computershare is, however, prepared to litigate where necessary or appropriate.

## **6) Board ownership and oversight**

The Computershare Limited Board acknowledges Computershare's duties as a corporate citizen and commits to paying the correct amount payable under local tax law. It therefore takes the lead in establishing a strong risk management culture and is ultimately responsible for the Group's tax affairs.

Tax risk and its impact on shareholders and clients must be managed by the Board in meeting its fiduciary duties, in line with any other commercial risk. These arrangements ensure that all significant tax related decisions are subject to review and approval by appropriate qualified and experienced staff and that all tax obligations, including UK tax obligations are met.

*This tax strategy has been published in accordance with the requirements set out in paragraph 19(2) in respect of qualifying UK sub-groups and paragraph 22(2) in respect of qualifying UK companies and branches, of Schedule 19 to the Finance Act 2016. These paragraphs apply to:*

- i) the UK sub-groups headed by the UK companies Computershare Limited and Computershare Investments (UK)(No.3) Limited;*
- ii) the standalone UK companies within the group, being Computershare Investments (UK)(No.8) Limited, Computershare Governance Services (UK) Limited and Computershare Company Secretarial Services Limited; and*
- iii) the UK branch of the Australian parent company – Computershare Limited.*