

Eircom UK Limited – UK Branch

TAX POLICY STATEMENT

Policy overview

This document sets out the UK Tax Strategy of eircom (UK) Limited – UK Branch (following “Eir”), in compliance with section 161 and section 22 (2) of schedule 19 Finance Act 2016.

Eir is a provider of communication services and solutions to Local Government, SME Enterprise and Wholesale customers across the UK. The company’s portfolio includes managed network services, unified communications and enterprise voice solutions. The company specialises in the provision of complex managed services across Local Government and SME Enterprise sectors.

The company’s fibre network covers all major population centres in Northern Ireland, extends to Points of Presence (POP’s) in Manchester and London and interconnects with a number of other operators. The company’s Network Operations and Service Operations centres are located in Belfast.

Eir observes and maintains the highest levels of corporate governance and implements control frameworks to ensure compliance with its obligations within the global community. This includes properly accounting for taxes and paying the right amounts according to tax legislation in force.

Business leaders are supported by tax professionals to ensure that tax outcomes of business decisions are properly understood.

1. Tax Planning

Eir has responsibility for corporate, indirect, income and employment taxes in the UK.

Eir engages in efficient tax planning that supports our business and reflects commercial and economic activity, will make use of available incentives and reliefs to reduce the tax cost of business, and will arrange its business affairs accordingly.

However, Eir will not knowingly make use of reliefs or incentives in a manner contrary to that intended by legislation, nor enter into artificial business arrangements whose purpose is solely for tax advantage.

Eir will not tolerate tax evasion corporately, by any of its employees, or by any of its business associates.

Our tax strategy is designed to ensure compliance with all legal and disclosure requirements, as well as with the applicable legal and fiduciary duties of directors and employees. Where appropriate, we seek external tax advice to ensure all tax planning is compliant with relevant tax laws and to ensure that all tax planning transactions are conducted in accordance with relevant tax regulations.

2. Relationship with the government

Eir is committed to acting with integrity at all times, maintaining a transparent, open and honest relationship with tax authorities and to undertake any such dealings in a professional and timely manner.

Eir's tax affairs are a private matter between Eir and HMRC. However, Eir will not enter into tax arrangements which would not be fully justifiable should they become public.

Eir actively seeks a professional, constructive and transparent relationship with HMRC and its representatives based on mutual respect and trust. Eir will not deliberately conceal or knowingly misrepresent issues to HMRC. If errors are discovered they are disclosed.

3. Transparency

Eir supports the principle behind multilateral moves towards greater transparency that increases the understanding of tax systems and builds public trust.

4. Risk Management and Governance

The Group Chief Executive Officer and the Group Chief Financial Officer are responsible for overseeing the effective execution of the business and, by extension, the tax strategy as well as monitoring risk exposures and establishing appropriate internal controls for risk identification and mitigation. The Board is supported by finance and tax teams who have responsibility for implementing the Tax Strategy and reporting back to the Board. A number of tax sensitive processes are performed within the finance and tax teams and each relevant individual is responsible and accountable for meeting their tax obligations, controls and policies as issued by the Board. Performance of the finance and tax teams is reportable to the Group Chief Financial Officer who in turn reports up to the Board.

Eir does not undertake aggressive or artificial tax planning, the sole purpose for which would be obtaining a tax advantage. We undertake tax decisions and planning as part of our overall business strategy and engage the services of professional advisers to assist with major or complex business decisions in order to fully understand any associated tax risks.

Eir will address Tax risks in the same way as other business risks: with diligent professional care and judgement to arrive at well-reasoned conclusions on how identified risks should be managed. Eir seeks to ensure that transactions are structured such that any tax reliefs or incentives available are realised in line with the intended tax legislation and only where there is a credible technical standing. The Board's on-going tax risk approach is based on principles of reasonable care and materiality. Each tax risk is measured based on a balance of impact (both financial and non-financial) of that risk and the likelihood that it will materialise. Risks identified are then communicated down to the finance and tax teams in order that they may be appropriately managed. There is no one level of risk that we are prepared to accept but each is considered on a case by case basis having taken into consideration all available facts and information.

Where there is risk arising from uncertainty of tax law application or interpretation, Eir will seek appropriate written advice from third party advisers to support the decision-making process, and consult with HMRC where appropriate.

Further information

The Tax Policy Statement will be reviewed and updated annually.

It was last approved on 2nd Oct 2023.