

PCCW LIMITED

(INCORPORATED IN HONG KONG WITH LIMITED LIABILITY)
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UK TAX STRATEGY

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UK TAX STRATEGY

This document sets out our tax strategy of our group companies as complying with paragraph 19 of Schedule 19 of the Finance Act 2016 of the United Kingdom. Periodic review and update will be performed.

By establishing the tax strategy, we aim to:-

- Comply with all relevant statutory tax obligations and BEPSⁱ requirements
- Identify and manage tax exposure in the evolving tax environment
- Ensure tax compliance requirements are accurately and timely filed
- Enhance tax risks awareness in any business decision making process
- Communicate standards of behavior expected for tax reporting team
- Maintain good relationship with tax authorities and governmental bodies

A. Code of conducts

The following roles and responsibilities are expected from the UK Finance team who is supported by the Group Tax team in the headquarters:

1. Observe relevant new tax laws, rules, regulations and reporting requirements
2. Review tax positions on issues arising from business conducts of the Group periodically
3. Cooperate and respond to tax authorities questions and queries in a timely manner
4. Strive to improve transparency in terms of tax reporting and tax positions adopted by the Group
5. Exercise professional judgments and establish evidence and support for tax positions
6. Adhere to the Group's Corporate Governance and Corporate Social Responsibility Policy

B. Tax compliance and reporting

In line with our Group's Corporate Social Responsibility Policy, Group Tax team and Finance team are obliged to:

1. File tax returns, settle tax payments, response to tax authorities' correspondence or queries and statutory tax obligation in timely manner
2. Prepare and provide documentations in support of the Group's tax positions and treatments on tax matters or issues as required by the applicable tax laws and regulations
3. Computation of tax shall be calculated in a professional manner.
4. Fulfill BEPS requirements, including the preparation of Master File, Local File and CbCRⁱⁱ as required by the respective countries/jurisdictions in a timely manner
5. Tax payments shall be settled duly and on time to avoid additional costs (such as interest, surcharge and penalty)
6. Observe and response to changes in tax laws and regulations on tax compliance and reporting in countries / jurisdictions at where the Group operates

7. Advice and assistance should be sought from external advisors on material transactions and whenever necessary expertise is not available in-house.

C. Approach to risk management and governance arrangements

Group Tax has taken the following approach to manage tax risk with regards to the Group's overall strategy and Corporate Social Responsibility Governance:

1. Perform technical research, assess tax risks and consequences, gather facts and evidence, obtain third party advisors' opinion before forming tax positions or reaching conclusions on tax issues
2. Engage external professional or advisors as needed
3. Keep update on changes in tax regulations and compliance requirements and response proactively
4. Alert management if significant tax dispute or uncertainty arisen and review internal procedures and records to assess tax risk areas and establish tax defense
5. Encourage sharing of experience among tax professionals to establish consistent approach and position
6. Communicate and encourage business units to approach Group Tax for tax advice and guidance for tax issues arising from business operations and transactions

D. Attitude towards tax planning

The Group believes commercial and economic substance shall be the basis for our business arrangements. Our group structure is established with the purpose of reflecting the diversification of businesses of the Group and functions of each of the business units. Tax planning shall be conducted with the aim to enhance tax efficiency (e.g. prevent double taxation) by making optimum use of all permissible allowances, deductions, concessions, exemptions, rebates, exclusions and so forth, available under the applicable tax law and regulations.

Our transfer pricing policy is established to reflect the functions and risks of each of the entities involved such that income will be taxed accordingly by the relevant tax authorities in an efficient and fair manner. We aim to ensure that our profit will only be taxed once.

E. Level of risk that the group is prepared to accept

Tax risks always exist for tax issues not addressed by current tax regulations or for matters where tax authorities and our Group have conflicting opinions. Tax risks are also part of business risks, we cannot totally avoid but try to minimize tax risks. We only accept tax risks where we have technical advice received from subject matter experts to support our positions.

Group's reputation and tax authorities' relationship are also factors for determining the level of risks the Group is willing to accept. We will not sacrifice the Group's reputation and jeopardize our good working relationship with the tax authorities. To mitigate tax risks on significant issues, we will seek for advice from appropriate tax experts and will try to initiate discussions with governing tax authorities where grey areas or conflicting opinion exist in order to reach for agreement on tax treatments and apply for tax rulings, if possible.

F. Approach of the group towards its dealings with HMRCⁱⁱⁱ and other tax authorities

Our Group believes that transparent and open communication and collaboration with HMRC and other tax authorities are essential in establish good working relationship. These relationships could be achieved by our practice and attitude:

1. Identify responsible tax officers in charge of the Group's tax matters in UK
2. Designate tax or finance staff to be responsible to communicate with HMRC and governing tax authorities to ensure effective communication

3. Cooperate with tax authorities in providing information and answering enquiries to avoid delay in settling tax issues or dispute
4. Communicate proactively with HMRC on uncertain tax issues and latest change in regulations or practices.
5. Establish mutually respectful relationship with HMRC and other tax authorities
6. Understand local practice, tax structure and reporting hierarchy of HMRC and other tax authorities

G. Strategy embedded across the organization and supported by adequate systems and processes

The Group tax strategy is communicated to the Group's employees via our internal policy and reporting line:

1. Group Tax team is part of the Finance function and reports to Group Chief Financial Officer.
2. Group Tax team cooperates with Finance team and/or Business Units to reviews tax issues affecting the structure of the group and material business transactions before implementation.
3. Conduct regular Group Tax team meeting to communicate Group Tax's positions on significant tax issues and update on significant changes in tax laws and requirements
4. Entities' annual tax compliance checklist are prepared for Group Tax team's review and assessment on the tax compliance status of each entity
5. Employees are required to abide by the Group's taxation policy and transfer pricing policy set out in the Group Policy and Procedure in decision making process
6. All Business Units are advised to approach Group Tax team for tax guidance or advices if they foresee tax will be an issue for considering
7. Perform regular internal audit to ensure tax compliance procedure is implemented accordingly and taxation policy is followed in decision making process

ⁱ **Base erosion and profit shifting ("BEPS")** refers to tax avoidance strategies that exploit gaps and mismatches in tax rules to artificially shift profits to low or no-tax locations.

ⁱⁱ **Country-by-Country Reporting ("CbCR")** is one of the four minimum standards under the Organisation for Economic Co-operation and Development BEPS Project to which over 100 countries have committed, covering the tax residence jurisdictions of nearly all large multi-national enterprise groups. Where CbCR is implemented effectively, and in line with the conditions set out in the BEPS Action 13 Report, it will give tax authorities unprecedented access to information on the global allocation of an multi-national enterprise group's revenue, profit, tax and other attributes for high level transfer pricing risk assessment and the assessment of other BEPS-related risks.

ⁱⁱⁱ **His Majesty Revenue and Customs ("HMRC")** is a non-ministerial department of the UK Government responsible for the collection of taxes, the payment of some forms of state support and the administration of other regulatory regimes.