



Tax Strategy Statement

This document is published in satisfaction of applicable requirements of Schedule 19 of the UK Finance Act 2016 which applies to the following Orange Group entities, as listed below:

- Orange Brand Services Limited
- Orange Telecommunications Group Limited
- Orange Corporate Services Limited
- Orange International Limited
- Orange Participations UK Limited
- Jazzcom Limited
- Unanimis Holdings Limited in liquidation
- Globecast UK Limited
- Orange Business Holdings UK Limited
- Orange Business UK Limited

These companies are hereafter collectively referred to as the “Orange British Companies” or the “Companies” and individually as the “Orange British Company” or the “Company”.

Tax risk management and governance

Tax risk management and governance processes are overseen by the Board of each Orange British Company (with guidance and advice from their in-house advisers, and from external tax advisers, if further expertise is required).

Each Company’s Finance Director has primary responsibility for his/her Company’s taxation policy with the support of internal and external advisors who deal with tax forecasting and tax accounting (as well as corporation tax compliance).

The Orange tax department maintains oversight of tax compliance across the Orange Group and is closely associated with the Companies’ management and governance processes.

On an annual basis, the Orange British Companies carry out a review, for the purpose of completing the annual Senior Accounting Officer’s Certificate. This requires confirmation from business managers that the necessary processes and procedures are documented, are up to date and have been adhered to. In operating their tax risk management and governance processes, Orange British Companies have adopted a prudent approach with respect to their tax affairs and tax strategy. The Companies are committed to full compliance with their tax obligations, and to pay the correct amount of taxes. The Orange British Companies seek to ensure that their tax affairs remain consistent with a low risk approach, both in financial and reputational terms.

Tax planning and tax risk

The Orange British Companies do not seek to structure transactions in ways that yield tax results which are inconsistent with the underlying economic consequences of the transactions.



The Companies have adopted a prudent approach with respect to their tax affairs and their tax strategy. Accordingly, they do their utmost to pay the correct amount of taxes within the required deadlines and in accordance with applicable arm's length principles.

To ensure that they correctly report their results in each jurisdiction where they operate, the Orange British Companies carry out benchmark studies on a regular basis to identify arm's length pricing for cross-border flows of royalties and services, as required by the UK and other national authorities.

Relationship with HMRC

The Orange British Companies openly and constructively engage with HMRC, in a spirit of mutual trust and co-operative compliance. The Orange British Companies consider this to be the best way to ensure that the right tax is paid at the right time and to maintain a good working relationship with HMRC. Where appropriate and possible, the Companies will engage with HMRC on a timely basis in relation to any area of material uncertainty, including the interpretation of law, so as to minimize their tax risk and to provide greater certainty for both parties in advance of formal filings.