



Tax Strategy Statement

(for the year ending 31 December 2019)

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 International Limited
Orange Participations UK Limited
Globecast UK Limited
Orange Business Holdings UK Limited
Orange Business UK Limited
Orange Innovation UK Limited
SL Bidco UK Limited
SecureLink UK Limited
SDH Holdco Limited
SDH Bidco Limited
Quadrant Networks Limited
Cygna Technologies Limited
SensePost UK Limited
SDH UK Limited
SecureData Finance Limited
SecureData Europe Limited

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

Tax risk management and governance

Tax risk management and governance processes are overseen by the Board of Directors of each Orange in the UK Company, with guidance and advice from in-house advisers and from external tax advisers where 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 in the UK 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, up to date and have been adhered to.

In operating their tax risk management and governance processes, Orange in the UK 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 in the UK 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 in the UK 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 in the UK 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 in the UK Companies openly and constructively engage with HMRC, in a spirit of mutual trust and co-operative compliance. The Orange in the UK 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.