

OpenText – UK Tax Strategy

This UK Tax Strategy applies to OpenText UK Limited and all other relevant UK entities in the group headed by Open Text Corporation (“the Group”).

The UK Tax Strategy has been prepared specifically to meet the UK legislative requirement to publish a tax strategy in Part 2 of Schedule 19, Finance Act 2016. Its aim is to set out our approach to arranging the Group’s UK tax affairs.

This UK Tax Strategy applies to all UK taxes applicable to the Group’s UK entities and is reviewed and updated as appropriate.

Our UK Tax Strategy has four key components:

1. Approach to UK tax compliance

The Group is committed to complying with all relevant UK tax laws, rules and regulations. Our aim is to pay the amount of tax legally due at the right time.

Our aim is to submit all UK tax returns on a timely basis and report to HM Revenue & Customs (“HMRC”) sufficient information to ensure that the company’s tax affairs are transparent. Documentation is retained to support the information presented in the tax returns for at least the period required by law.

2. Attitude to UK tax planning

The Group will consider undertaking a commercial transaction in a way that allows the Group to take advantage of tax reliefs or incentives, providing this is aligned to our commercial objectives. This is consistent with the Group’s overall approach to risk management.

3. Risk management and governance

Given the size and scope of our business, risk may at times arise from the interpretation and application of tax legislation to our business transactions. The Group has internal controls in place to identify any material tax risks. When such risks are identified, they are recorded, such that senior management can monitor and review them on a regular basis; if necessary, they will take steps to minimise these material risks. All material risks are recorded and reported formally to senior management at least on a quarterly basis.

The Group aims for certainty on the tax positions it adopts but where tax law is unclear or subject to interpretation, written advice or confirmation may be sought as appropriate to ensure that its position would, more likely than not, be settled in our favour.

4. Approach toward dealings with HMRC

The Group expects all staff to conduct themselves with integrity, honesty and respect when communicating with HMRC.

We strive for all information presented to HMRC to be arranged in a clear and transparent manner and for all relevant legal disclosure requirements to be complied with in order to avoid unnecessary disputes.

This UK Tax Strategy should be read in conjunction with our Code of Business Conduct and Ethics and is part of our commitment to the Group's ethical framework.