



IBM United Kingdom UK Tax Strategy

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IBM is a global cloud platform and cognitive solutions company headquartered in Armonk, New York, United States with operations in over 175 countries. The company originated in 1911 and has continually evolved over the past century to remain at the forefront of technological innovation.

IBM has a long history in the UK, having opened our first office in 1951, and has substantial local operations. Our capabilities in data and analytics, cloud, mobile, social and security have helped the UK evolve to become one of the world's most digitally advanced nations. This digital revolution empowers us and our clients to gather and analyse data in ways that have never been possible before – helping UK organisations unlock new insights and usher in a new era of cognitive business.

Introduction to IBM UK's Tax Strategy

IBM UK is committed to conduct its tax affairs in accordance with IBM Corporation's Global Tax Policy and include the following objectives:

- Comply with all relevant laws, regulations and reporting and disclosure requirements;
- Maintain an open relationship with the tax authorities based on collaboration and integrity;
- Apply diligence and care in the management of the processes and procedures by which all tax related activities are undertaken, and ensure that appropriate tax governance procedures are in place;
- Use available incentives and reliefs while ensuring that these reliefs are not used for purposes which are knowingly contradictory to the intent of the legislation.
- Maintain a governance framework consistent with IBM's broader corporate governance policies.

This tax strategy applies to all IBM UK group entities.

Risk management and governance

IBM UK believes that it is important to pay the correct amount of tax at the right time, under all relevant laws and regulations. IBM's transfer pricing complies with the OECD Transfer Pricing Guidelines, has remained consistent for many years and is applied globally across the IBM group. We operate an effective tax control framework to identify key tax risks and to manage those risks through appropriately designed and operated controls, policies and processes. Where the law is uncertain IBM UK routinely seeks advice from independent external tax advisors.



Level of acceptable tax risk

We aim for certainty on the tax positions we adopt, so diligent professional care and judgement is employed to assess tax risks arising from our commercial operations. We employ experienced tax professionals and where there is any uncertainty as to the application or interpretation of tax law we seek assurance in support of the decision-making process including, where appropriate, external professional guidance and advance clearance from HMRC.

Attitude to tax planning

IBM UK will consider different tax outcomes when looking to undertake commercially motivated transactions. IBM UK plans its tax matters for tax efficiency and does not engage in tax schemes that go against the intention of the legislative authority.

Approach towards dealings with HM Revenue & Customs (HMRC)

IBM UK is committed to the maintenance of an open and collaborative relationship with HMRC and, through the Customer Compliance Management programme, provides HMRC with regular business updates.

We are also committed to making fair, accurate and timely disclosure in correspondence and returns and responding to queries and information requests in a timely fashion. Where available, we will seek advance clearance from HMRC through the relevant clearance programmes.

In accordance with paragraph 16(2) of Schedule 19 of the Finance Act 2016, this document is approved by the Board of IBM United Kingdom Limited on behalf of all its UK entities of the IBM group headed by International Business Machines Corporation.