



Introduction

EQ is a leading international provider of shareholder, pension, remediation, and credit technology. With over 6,000 employees, it supports 37 million people in 120 countries. EQ's purpose is to care for every customer and simplify every transaction, delivered with less of an impact on the environment.

We are a values-led organisation, aligned with the expectations of our clients, investors, employees, suppliers, communities, regulators and society as a whole. We take corporate governance seriously and are committed to being a responsible business.

This tax strategy is published in accordance with the relevant provisions of Schedule 19 of Finance Act 2016 and is relevant for the year ending 31 December 2023.

EQ regard this publication as complying with the duties set out under paragraph 16 (2) of that Schedule.

This tax strategy was approved by the Audit & Risk Committee, a sub-committee of the Board, of Orbit Private Holdings I Limited on 1 November 2023.

Aim

The group's tax affairs are managed to be consistent with our wider corporate reputation and in line with EQ's overall high standards of governance.

EQ is committed to full compliance with the applicable laws and regulations in the countries in which it operates, to mitigate inherent tax risks and to enhance and protect its reputation.

Our tax strategy comprises four key components.

Approach of the group to risk management and governance arrangements in relation to tax

The Board has overall responsibility for taxes, including this tax strategy.

Executive responsibility for tax matters is delegated to the Chief Financial Officer. Day-to-day management of EQ's tax affairs is delegated to the Director of Tax.

The Audit and Risk Committee's requirements to monitor the integrity of EQ's financial and reporting system, internal controls and risk management framework, expressly includes those elements relating to taxation.

In accordance with UK rules, EQ nominates a Senior Accounting Officer (SAO) for each of its UK companies. The SAO ensures that processes of tax compliance are carried out correctly and liaises with the Director of Tax about tax risks and controls to mitigate those risks.

The Director of Tax oversees all compliance obligations and actively monitors and manages risks together with the wider business and commercial teams.

The wider group finance team are sufficiently trained and qualified and have the necessary skill and experience to apply the approach set out in this strategy.

Key risks and issues are escalated to the Board and the Audit and Risk Committee on a regular basis as appropriate.

Attitude of the group towards tax planning

It is recognised that EQ has a responsibility to pay an appropriate amount of taxes in each of the jurisdictions in which it operates, and EQ is committed to doing so in a timely manner.

This is balanced with the overarching objective to derive sustainable economic value from the business activities of the group.

Where applicable EQ will seek to utilise tax incentives and reliefs which are statutorily available, e.g. Research & Development Expenditure Credits.

EQ does not participate in any marketed tax avoidance schemes or any arrangements which have no commercial basis.

Advice may be sought from external tax advisers to support the in-house team in evaluating risk areas, adhering to complex tax laws and implementing best practice.

Level of risk in relation to taxation that the group is prepared to accept

EQ is committed to ensuring the integrity of all reported tax numbers and seeks to comply fully with its regulatory and other obligations, acting in a way which is consistent with our core values and principles.

EQ monitors changes to tax legislation in the territories in which it operates and will make changes, where necessary, to internal tax processes as a result of these.

In relation to any specific issue or transaction, the Board is ultimately responsible for identifying the risks, including tax risks, which need to be addressed and for determining what actions should be taken to manage those risks, having regard to the materiality of the amounts and obligations in question.

The approach of the group toward dealings with Tax Authorities

EQ engages with tax authorities constructively, honestly and in a timely manner. We will seek to resolve any disputed matters through active and transparent engagement.

As the Group is a large business, in the UK HMRC appoints a Customer Compliance Manager (CCM) to co-ordinate HMRC's risk assessment and intervention activities.

The Group is in regular contact with the CCM and the dedicated team that HMRC has appointed in the UK with specialists in corporate tax, employment taxes and VAT.

EQ update HMRC on a regular basis about developments in the business and aims to supply any information it may require on a full and timely basis.

EQ adopts this same approach in the overseas markets which it serves.