

1 Scope

- 1.1 DLA Piper UK LLP (DLA Piper) is a limited liability partnership organised in the United Kingdom and registered in England and Wales. We provide legal services as our principal activity.
- 1.2 This document sets out the strategy of DLA Piper in relation to its UK tax affairs. This strategy was published on 9 April 2024, and DLA Piper regard this as complying with its duty under paragraphs 16 and 25 of Schedule 19 Finance Act 2016, in its financial year ending 30 April 2024.
- 1.3 This UK tax strategy has been approved by and is owned by the Board of DLA Piper, who have responsibility for monitoring its application. The Board is assisted in this regard by DLA Piper's Tax and Audit Committees. The strategy will be reviewed annually and any amendments authorised by the Board.

2 Governance

- 2.1 DLA Piper manages its tax affairs in a way that is consistent with its overall high standards of governance.
- 2.2 Ultimate responsibility for DLA Piper's UK tax strategy and compliance rests with its Members. The Members of DLA Piper delegate management of these issues to the Board of DLA Piper.
- 2.3 The Firm operates a Tax Committee that provides support, direction and oversight to the Board in respect of tax compliance risks and tax strategy. The Tax Committee is made up of appropriately experienced and qualified individuals. The Tax Committee reports to the Audit Committee during the year, which in turn, reports on those tax risks and strategy to the Board. To ensure consistency of reporting, the chair of the Tax Committee is both a Board and Audit Committee member and the Chief Financial Officer is a member of the Board and an attendee at Audit Committee meetings.
- 2.4 Day to day management of the Firm's tax matters is delegated to appropriately experienced and qualified staff.

3 Management of tax risks

- 3.1 The evaluation and control of DLA Piper's tax risks is carried out within (and as part of) DLA Piper's internal framework that has been put in place to evaluate and control financial reporting. DLA Piper has processes which ensure compliance with tax reporting obligations.
- 3.2 So far as is reasonably practicable, DLA Piper actively seeks to identify, control and minimise tax risks across all of its different tax processes.
- 3.3 Management of the Firm's tax affairs is delegated to the Director of Tax and Partnership Services who provides oversight and support to the in-house tax team.
- 3.4 The in-house tax team who are responsible for DLA Piper's tax processes are appropriately qualified and experienced. Individuals are allocated to review activities and processes relating to different taxes based on their specialisms. This allows key risks to be monitored for legislative changes and the associated implications for the business to be reviewed.

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- 3.5 For tax matters requiring additional and specialised knowledge, the in-house tax team engage suitably qualified legal and accountancy firms or other consultants with specialised knowledge of taxation.
 - 3.6 Where necessary, the in-house tax team will seek guidance from HMRC through clearances on complex issues where the tax position is uncertain.

4 Attitude to tax planning and level of tax risk

- 4.1 DLA Piper manages its tax affairs to ensure that it complies with legal requirements and pays the amount of tax required by law.
- 4.2 DLA Piper seeks to adopt a responsible attitude towards structuring its business and regards adherence to and compliance with tax requirements as critical.
- 4.3 DLA Piper seeks to take advantage of available tax reliefs, exemptions and incentives in line with tax legislation but does not undertake tax planning unrelated to DLA Piper's commercial transactions. DLA Piper does not put in place any arrangements that are contrived or artificial.
- 4.4 The level of risk that DLA Piper accepts in relation to UK tax is consistent with its overall objective of obtaining certainty in its tax affairs.

5 Working with HMRC

- 5.1 DLA Piper seeks to have an open and constructive relationship with HMRC (and international tax authorities, as required) and considers this to be critical to the management of its tax affairs.
- 5.2 DLA Piper seeks to maintain a low-risk rating with HMRC. DLA Piper does this by conducting its relationship with HMRC in such a way as to mitigate and minimise tax risk, actively engaging with HMRC and keeping HMRC informed of key transactions and changes in its business. DLA Piper regularly invites HMRC to meet with it so that the DLA Piper can explain its business and discuss any changes or issues with HMRC.
- 5.3 DLA Piper communicates with HMRC in a transparent and collaborative manner, wherever possible discussing tax matters with HMRC in advance. When providing HMRC with information, DLA Piper discloses all relevant facts and highlights areas where there is scope for alternative tax treatments.
- 5.4 DLA Piper would expect to engage in open and frank discussions with HMRC to resolve any dispute although it is prepared to defend its position where it disagrees with HMRC decisions.

April 2024