



THIS TAX POLICY APPLIES TO SUNGARD AVAILABILITY SERVICES (UK) LIMITED AND ALL UK ENTITIES IN ITS GROUP.

► Our tax policy comprises following key components:

① Commitment to compliance

We are dedicated to being compliant with tax law and practice in the UK. By this we mean paying the right amount of tax in the right place at the right time. It involves disclosing all relevant facts and circumstances to the tax authorities and claiming reliefs and incentives where available.

External advisors are engaged to provide corporate tax compliance services.

Where Sungard identify a significant uncertainty or complexity in relation to a tax risk, we may seek to rely on external advice, and have strong ongoing relationships with large tax advisory firms.

We are investing in ongoing training for the relevant members of our finance team to increase the awareness of tax principles to enable them to successfully carry out their tasks.

② Responsible attitude to arranging our tax affairs

When making commercial decisions one of the many factors we will consider is the tax laws of the countries in which we operate. We establish entities in jurisdictions suitable to hold our overseas investments, giving consideration to our business activities and the prevailing regulatory environment.

We adhere to relevant tax law and we seek to minimize the risk of uncertainty or disputes through communication with the relevant tax authorities.

We conduct transactions between Sungard group companies on an arm's-length basis and in accordance with current OECD principles.

Sungard Availability Services (UK)

Limited and its related UK entities are part of the Sungard AS New Holdings ("Sungard") group.

Sungard provides flexible availability services that help ensure organizations keep applications on and available. Sungard has proven expertise to provide managed IT services, information availability consulting services, business continuity management software and disaster recovery services to clients in North America, Europe, and India. The Company helps customers improve the resiliency of their mission critical systems by designing, implementing and managing cost-effective solutions using people, process and technology to address enterprise IT availability needs.

This policy covers our approach to arranging our UK tax affairs.

③ Effective risk management

Our approach to tax risk management is to ensure that tax risks are proactively identified, measured, managed and reported.

The following are key features of our approach:

- Creating an awareness of tax risk at all levels within the organisation
- Instilling a culture of tax risk management and risk ownership

Given the nature of our business and complexity of tax laws, we will have risks from time to time. We will seek to proactively identify and manage those risks.

In some cases we may seek external advice, and where appropriate, risks will be escalated to the CFO, Audit Committee and Board for their consideration.

④ Constructive approach to engaging with HMRC

In any interactions with tax authorities employees are expected to act courteously and honestly with integrity, respect and fairness and in a spirit of co-operative compliance.

We respond to all HMRC information requests in full and in a timely manner.

Wherever possible, we will consult with HMRC on a real time basis, to increase tax certainty.

⑤ Governance

The EMEA & APAC Chief Accounting Officer is responsible for ensuring that policies and procedures that support the approach are in place, maintained and used consistently.

Sungard Availability Services (UK) Limited regards this publication as complying with the duty under Sch 19 FA16.

⑥ List of UK entities covered by this policy

- Sungard Availability Services (UK) Limited
- Sungard Availability Services (DR) Limited
- Guardian iT
- Guardian dr (Overseas Holdings) Limited
- Safetynet Limited
- Strohl Systems (UK) Limited
- IXguardian Limited
- TeleVault iT Limited
- Safetynet Group
- Safetynet International Limited
- Computer Stand-By Limited
- Sungard Availability Services Holdings (UK) Limited

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