



## **Tax Strategy**

### **Introduction**

The aim of this tax strategy publication is to set out the approach to tax planning and risk adopted by the Mitel group companies operating in the UK (referred to as Mitel for the purposes of this document). This tax strategy document intends to fulfil the obligations with respect to Section 161 and Paragraph 19 of Schedule 19 of the Finance Act 2016.

### **Tax risks**

Mitel operates in several tax jurisdictions and is involved in cross border transactions with other entities in the worldwide Mitel group. Transfer pricing compliance is a key consideration and focus for Mitel. All transactions with other entities in the worldwide Mitel group are carried out on an arm's length basis in accordance with Organisation for Economic Co-operation and Development (OECD) and HM Revenue & Customs (HMRC) guidelines and local tax legislation. Documentation is maintained and updated on an annual basis to support this position.

Mitel ensures that it meets its filing and payment obligations in a timely and accurate manner for all taxes, including corporation tax, VAT and employment taxes (PAYE & NI). To achieve this Mitel employs a dedicated tax professional in the UK, who is supported by a worldwide tax team and local finance and human resources professionals. Mitel also seeks external professional advice where necessary to supplement local internal knowledge.

### **Tax planning**

Mitel seeks to take advantage of available tax opportunities to minimise its tax burden but does not enter into artificial arrangements for tax purposes which have no commercial substance.

Mitel's Code of Business Conduct states that it *"sets out principles and standards grounded in moral, ethical and legal behaviour that are intended to guide all Mitel activities. All Mitel employees, officers and directors must at all times conduct business in an ethical and honest manner, consistent with the principles of this Code."*

In relation to taxes specifically, the Code states that *"Mitel strictly complies with and pays all known applicable taxes, required by provincial, federal, state, local and foreign laws. Many of these laws require the reporting of financial information, payment of taxes due, filing of tax returns, and withholding or collecting of necessary taxes on behalf of our workforce."*

### **Working with HMRC**

Mitel adopts an open and honest approach to its working relationship with HMRC and other tax authorities. Full disclosure of relevant information is provided to enable proper review of the company's tax affairs. Where enquiries arise, Mitel works proactively with HMRC to provide all information required to achieve a timely conclusion to any investigations.

Mitel group companies for the purposes of this document are MLN TopCo Limited; Mitel Networks (International) Limited; Mitel Europe Limited; Mitel Networks Limited; Mitel Networks Holdings

Limited; Mitel Networks Pension Trustee Company Limited; Inter-Tel Europe Limited; Unify Holding UK 1 Limited; Unify Enterprise UK Holdings Limited; Unify UK International Limited; and Unify Enterprise Communications Limited.

This tax strategy applies to Mitel for the year ended 31 December 2023.