

kaspersky

Kaspersky UK Tax Strategy

December 2019

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Introduction

This document, approved by the Board, sets out Kaspersky's policy and approach to conducting its UK tax affairs and dealing with tax risk, and is made available to all stakeholders.

The document will be periodically reviewed by the Global Tax team, and any amendments will be approved by the Board of Directors.

We regard this publication as complying with the duty specified under Part 2 of Schedule 19 to the UK Finance Act 2016.

Policy overview

Kaspersky is committed to conducting its tax affairs so as to comply with all relevant laws, rules and regulations and reporting and disclosure requirements. The group's tax affairs are managed in a way which takes into account the group's wider reputation and standards of governance. We are trusted by our customers to protect what is most important to them, and as a large UK business we aim to be trusted by the tax authorities in how we conduct our tax affairs and deal with tax risk.

1 - The approach of the group to risk management and governance arrangements in relation to UK tax

The management of tax is overseen by the Group's Chief Financial Officer, to whom the Global Head of Tax reports, and tax governance is ultimately overseen by the Board. Our tax status is reported regularly to the Board by the Group's Chief Financial Officer.

Professional diligence and care is applied to our management of all risks associated with tax matters to evaluate those risks. Where there is uncertainty as to the application or interpretation of tax law, appropriate advice is taken from third party advisers.

2 - The attitude of the group towards tax planning so far as affecting UK tax

The Group takes a conservative approach to tax and does not pursue aggressive UK tax planning. Our tax profile follows our business arrangements. Where alternative routes exist to achieve the same commercial result the tax consequences, in compliance with all relevant laws, are considered as part of normal business decision-making. We do not enter or undertake marketed tax avoidance planning or “schemes”.

Incentives and reliefs may be claimed to reduce the tax costs of conducting our business activities, but we do not knowingly enter into arrangements that are highly contrived or artificial. For example we do not undertake transactions which are inconsistent with the underlying economic consequences or are clearly contrary to the intention of Parliament.

3 - The level of risk in relation to UK tax that the group is prepared to accept

Kaspersky operates in a dynamic and changing world, where we see fluctuations in demand for different products and solutions, the strength of the economy and the various currencies in which our offerings are sold.

Our policy is to minimise risk wherever possible when conducting our business affairs including tax matters. We actively seek to identify, evaluate, and monitor and manage UK tax risks so as to mitigate such risks. Where there is significant uncertainty or complexity in relation to a risk, external advice is sought.

4 - The approach of the group towards its dealings with HMRC

An important part of our tax strategy is the maintenance and further development of a cooperative and proactive working relationship with HMRC. We engage with HMRC with honesty, integrity, respect and fairness and in a transparent manner. Wherever possible, we do so on a real time basis.