

**UK TAX STRATEGY
STATEMENT
2019**



UK Tax Strategy Statement

ST Telemedia Group (the “Group”) is an active investor in the communications and media, data centres, and infrastructure technologies businesses. We aim to add distinct and complementary value to the portfolio with each company we invest in.

This tax strategy sets out our approach towards conducting our UK tax matters, and satisfies our obligations under the UK Finance Act 2016 for the financial year ended 31 December 2019. It applies to all UK subsidiaries of ST Telemedia, which presently are data centres held by ST Telemedia Global Data Centres.

The Group will continue to regularly review and update its tax strategy to ensure it remains appropriate in a constantly changing business and global tax environment.

Risk Management and Governance

The governance of the Group’s tax strategy is overseen by the Group Tax function which reports to the Chief Financial Officer. The Group Tax team is made up of qualified and experienced personnel. The Tax team keeps abreast with tax developments through continuous professional development. The team works closely with the finance, business and operations team to gain insight into the activities at the ground level. This ensures that potential tax issues are addressed in a timely and appropriate manner. Professional tax advice is sought where necessary to determine an appropriate tax position particularly where there is uncertainty in relation to any commercial transaction or interpretation of the tax legislation.

The Group risk management process entails a five-step approach (i.e. risk identification, risk assessment, risk mitigation, risk monitoring and risk reporting). When tax risks are identified, they will be assessed, actions will be taken to mitigate the risks and the status are monitored closely. Certain risks may have to be reported to the senior management (or risk management committee) if the impact or likelihood of the risks occurring warrants closer monitoring at the Group level.

The risk governance structure comprises the Board, and the Audit and Risk Management Committee (ARMC). The risk monitoring by ARMC is aided by the internal audit team and the risk management function within finance team. This structure provides segregation of duties, defines risk-taking responsibility and authority, and promotes ownership and accountability of risk factors.

Approach towards UK Taxation

The Group’s attitude towards tax planning in UK is guided by the parameters of the Group’s risk strategy. The strategy reflects the Group’s commitment to deliver value to shareholders, employees, customers and partners through sustained profitable growth.

The Group is committed to being a responsible corporate citizen in UK. We conduct our UK tax affairs in a manner that is consistent with our Group’s values and corporate social responsibilities. We manage our tax risks by:

- Meeting the applicable UK tax requirements and ensuring that all UK tax returns are accurate and tax payments are made on time
- Making sure that tax affairs and processes are driven by business strategies and aligned with commercial activities

The Group seeks a low risk approach towards tax governance, reporting and planning. Any tax planning undertaken has commercial and economic substance and aligns with the Group's business model.

Relationship with HMRC

The Group seeks to maintain a transparent and collaborative relationship with HMRC. The Group is committed to adopt a proactive and constructive approach to resolve any tax issues in a timely manner.

ABOUT **VIRTUS**

VIRTUS Data Centres, the UK's fastest growing data centre provider, owns, designs, builds and operates the country's most efficient and flexible data centres. VIRTUS leads the industry with award winning innovation in hyper efficient, Ultra High Density and highly interconnected facilities.

Located in and around London's metro, VIRTUS offers the best of traditional retail and wholesale colocation models, combining dedicated support and complementary ecosystems with low cost, scalable and custom solutions, in uniquely flexible and customer friendly packages. Customers also benefit from Tier III certified, ultra-secure facilities, that provide 100 percent uptime; protecting and connecting data, applications, networks and clouds within VIRTUS Data Centres and the global digital economy.

For more information please go to: www.virtusdatacentres.com

VIRTUS Data Centres is a STTelemedia Global Data Centres company