



# Donnelley Financial Solutions UK Ltd and UK Group Tax Strategy

## Introduction

This statement is made pursuant to Schedule 19 of the Finance Act 2016 and sets out Donnelley Financial Solutions UK Group's policy and approach to conducting and managing its UK tax affairs. In publishing this statement Donnelley Financial Solutions UK Group is fulfilling its obligations under the Finance Act 2016.

This statement will be periodically reviewed by management with responsibility for tax and accounting, and any amendments will be approved by the Board of Directors. This statement is effective for the Company's financial years commencing 1 January 2018 and will remain in effect until any amendments are approved by the Board of Directors. This statement shall in any event be reissued no later than 31 December 2025.

In this statement references to "the Company", "DFIN" or "UK Group" shall be reference to the group of UK companies primarily held through Donnelley Financial Solutions Group UK Ltd, which form part of the UK Tax Group. The UK Group is wholly-owned by Donnelley Financial Solutions, Inc., the US parent company.

## UK Group Tax Policy

DFIN is committed to conducting its tax affairs consistent with the following objectives:

1. To comply with all relevant tax laws, rules, regulations, and reporting and disclosure requirements; and
2. To apply due professional diligence and care in the management of risks associated with tax matters, and in doing so ensure that appropriate governance and assurance procedures are implemented.

## Principles of Ethical Business Conduct

DFINs' Principles of Ethical Business Conduct policy sets out the principles that all employees and officers of the Company are expected to adhere to in all dealings and business matters, including its tax affairs, a copy of which can be found on the Donnelley Financial Solutions, Inc.'s website: <https://investor.dfinsolutions.com/corporate-governance/governance-documents>

DFIN requires that all staff should act honourably, with honesty and integrity, in compliance with all applicable domestic and foreign laws and regulations, and in accordance with the highest moral/ethical standards of responsibility and accountability in all dealings with our current customers, potential customers, business partners, suppliers, public officials, competitors and each other. Non-adherence to this policy may constitute a disciplinary matter and could lead to disciplinary proceedings that can ultimately include dismissal. In order to ensure the policy is reinforced and understood, all employees of the Company are required to partake in at least one training a year on the Company's principles of ethical business conduct.

### **Attitudes to tax planning**

DFIN believes that it should pay the amounts of tax legally due. There are circumstances where this requires judgement and so DFIN will determine the appropriate course of action, using available reliefs and incentives where possible. On occasions where tax treatment of a transaction requires specialist tax knowledge, DFIN will seek external professional advice. DFIN only follows tax strategies which are in compliance with the spirit of the law and within DFIN's commercial practices.

### **Tax risk management**

Diligent professional care and judgement is employed to assess tax risks and where there is uncertainty as to the application or interpretation of tax law, appropriate advice will be taken from third party professional advisers to support the decision-making process.

### **DFIN and its tax risks**

DFIN's strategic aim is to have low UK tax risk. DFIN seeks to achieve this aim through:

- (i) the submission of all UK tax returns on a timely basis including sufficient detail to enable HMRC to form an accurate view of its affairs.
- (ii) paying the appropriate amount of tax at the right time.
- (iii) ensuring that the departments who are involved in DFIN's tax processes are adequately resourced and supported, and that key personnel are retained to manage tax compliance issues on a knowledgeable and timely basis; and
- (iv) ensuring that all tax filing positions are supported with appropriate documentary evidence.

DFIN aims to be transparent throughout the tax compliance process, with its tax return positions and with its dealings with HMRC.

## Relationships with Tax Authorities

DFIN is committed to the principles of openness and transparency in its approach to dealing with tax authorities. All communication with the tax authorities and other relevant bodies will be conducted in a collaborative, courteous and timely manner. The goal is to strive for early agreement on disputed matters and to achieve certainty wherever possible.

Signed for and on behalf of Donnelley Financial Solutions UK Group Ltd



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Tuan Jin Aw

Director

Date: 19-Dec-2024



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Jerry Hall

Director

Date: 19-Dec-2024