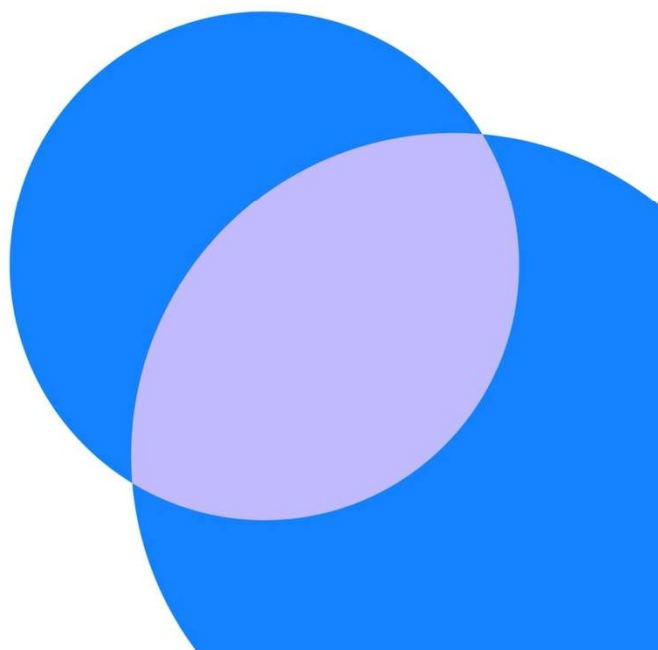


# UK TAX STRATEGY



# CITYFIBRE

## UK TAX STRATEGY

### A. Introduction

The Group UK Tax Strategy set out in this document outlines the following matters as they relate to the Connect Infrastructure Topco Limited Group and its subsidiaries \* ("CityFibre"). The UK Tax Strategy is approved by the Audit Committee and overseen by the Board of Directors.

This document is published in accordance with the requirements of paragraph 16 (2) of Schedule 19 to the Finance Act 2016 for the financial year ended 31 December 2021. It will be reviewed for necessary adjustments periodically and published annually.

### B. Basic Principles

This policy covers CityFibre's approach to arranging its tax affairs. Ensuring that CityFibre pays the right amount of tax, in the right place, at the right time, is core to our commitment to being a responsible business.

### C. CityFibre UK Group Tax Strategy

#### *Governance, risk management and compliance with UK tax laws*

We are committed to compliance with all statutory obligations and full disclosure to HMRC. Tax compliance for us means paying the right amount of tax at the right time. It involves disclosing all relevant facts and circumstances to HMRC and claiming reliefs and incentives where available and in accordance with applicable legislation.

The Governance framework for the correct application of and compliance with UK tax law is the responsibility of the Board of Directors. The Senior Accounting Officer ensures the group complies with the legislative requirements whilst continually seeking to improve the tax accounting arrangements. Day to day the responsibility for tax matters is with individuals in the finance department with support from suitably qualified external advisors.

We have established and maintain robust policies and processes to ensure that taxes are calculated correctly, paid in a timely manner and risk of error is minimised. An annual review of tax policies, processes and procedures is undertaken to comply with preparing the legal requirement to file a Senior Accounting Officer certificate.

#### *Our attitude towards tax planning*

In structuring our commercial activities, we will consider, among other factors, the applicable tax laws, with a view to maximising value on a sustainable basis for our shareholders.

We do not undertake tax planning unrelated to commercial transactions. We seek to ensure that our business grows and develops in a tax-efficient manner, and in doing this we act responsibly. This means we don't undertake tax planning that is unconnected with our business. We also don't undertake transactions that are designed solely to create a tax benefit.

Reliance is placed upon external professional advisors where there is need for specialist guidance and support.

\*Listed in the attached appendix



### *The level of risk we are prepared to accept for UK taxation*

The level of UK tax risk we accept is consistent with CityFibre's broader business risk and compliance framework.

In relation to any specific issue or transaction, the Board of Directors is ultimately responsible for identifying the risks, including tax risks, which need to be addressed and for determining what actions should be taken to manage those risks, having regard to the materiality of the amounts and obligations in question.

Where the applicable laws and regulations are subject to interpretation, we seek appropriate assurance regarding the position taken, using professional advisors and where appropriate directly from HMRC.

### *How we work with HMRC*

We are committed to maintaining a transparent and open relationship with HMRC.

As such, any inadvertent errors in submissions made to HMRC are fully disclosed and corrected as soon as is reasonably practicable.

Where HMRC takes a different interpretation of the tax impact of a particular business transaction, we seek to resolve this issue through open dialogue in a prompt and responsible manner.

## **Appendix – List of Group Companies and Company Registration Number**

1. Bolt Pro Tem Limited	08975479
2. Cityfibre Holdco Limited	11722699
3. CityFibre Holdings Limited	07488363
4. CityFibre Infrastructure Holdings Limited	08772997
5. CityFibre Limited	09759465
6. CityFibre Metro Networks Limited	06586002
7. CityFibre Networks Limited	07193219
8. Connect Infrastructure Bidco Limited	11320032
9. Entanet Holdings Limited	07902027
10. Entanet International Limited	03274237
11. Fibrenation Limited	11441177
12. Fibrecity Bournemouth Limited	06585858
13. Fibrecity Holdings Limited	06586083
14. Gigler Limited	06555306