



CLARIO HOLDINGS, INC. AND SUBSIDIARIES: UK TAX STRATEGY

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Clario Holdings, Inc. (together with its subsidiaries, “Clario”) is a leading global technology provider of clinical outcomes research services to biopharmaceuticals and contract research organizations. Clario regards this publication as complying with the duty required in accordance with Paragraph 19(2) and 22(2) of Schedule 19 to Finance Act 2016. Clario is publishing its tax strategy for the year ending 31 December 2022. We confirm that this strategy will apply to all UK subsidiaries of Clario and will be periodically reviewed and updated accordingly.

GOVERNANCE IN RELATION TO TAX

Responsibility for the tax strategy, the supporting governance framework, and management of tax risk for the Group ultimately sits with the Tax Department and is supported primarily by the V.P. of Tax. Day-to-day management of UK tax affairs is undertaken by the International Tax Manager. The internal tax function operates in compliance with Clario’s Policies and Procedures and internal control framework and is subject to review by the Audit Committee.

RISK MANAGEMENT

Clario addresses the risks it faces in its business through appropriate policies, assessment, communication and reporting. Clario has in place policies and procedures designed to reduce tax risk and ensure compliance with our responsibility for tax matters including:

- Ensure reasonable care is applied in relation to all processes which could materially affect its compliance with tax legislation;
- Maintain a tax risk register and perform regular tests of the tax controls in place. The key risks are monitored for business, economic and legislative changes, with changes to controls being made as required;
- Seek advice from our external advisors where appropriate.

LEVEL OF RISK IN RELATION TO UK TAXATION THAT CLARIO IS PREPARED TO ACCEPT

In line with our core business value “We do what is right”, Clario maintains a conservative approach to tax that allows for the minimization of tax costs through the implementation of tax relief and incentive strategies which are consistent with UK and international tax laws.

ATTITUDE TO TAX PLANNING

It is vital that all areas of our business feel supported from a tax point of view to enable us to achieve its commercial objectives. This includes both managing tax risk and making good investment decisions as appropriate with knowledge of all tax costs. Even when decisions are made which are in line with the strategy, risk can arise through poor implementation and execution of transactions, ineffective ongoing management business processes or other means.

The global tax team alongside the UK accounting team, therefore, aims to be involved in all stages of material and tax sensitive transactions from scoping through to post implementation reviews. Our goal is to fully and accurately comply with our tax obligations with the highest integrity. Where material uncertainty exists in any area of its business, Clario seeks advice to ensure that it is fully compliant with applicable laws.

INTERACTION WITH HMRC

Clario is cooperative and transparent with HMRC and strives to timely provide all relevant information that is required to review tax risks. We ensure that HMRC is aware of any significant transactions or changes to the business and seeks to discuss tax issues arising at an early stage. Clario doesn't have a history of implementing transactions where the tax treatment has potential to be uncertain. Clario acknowledges and understands the responsibility and obligation that it has as a large group of companies in the UK to work alongside HMRC and other regulatory bodies to ensure that our tax affairs are correct, appropriate and transparent.