



# DASSAULT SYSTÈMES

## UK TAX STRATEGY

## Objective

UK Tax Strategy published Dassault Systèmes SE (the “UPC”) & qualifying UK Sub-Groups (collectively known as “The Group”) in line with Finance Act 2016, Schedule 19, paragraph 16(2) for the financial year ending 31 December 2024.

The strategy applies to all wholly owned UK entities of Dassault Systèmes SE a listed company whose stocks are traded on Euronext Paris. Dassault Systèmes SE is the smallest group of undertakings for which a consolidation is performed. The qualifying UK Sub-Groups covered by this strategy are:

- Dassault Systemes UK Limited (Group)
- Medidata Solutions International Ltd
- MDSOL Europe Limited
- Centric Software Limited

The principal activity of the Group is to sell and support Dassault Systèmes **3DEXPERIENCE** software and services in the UK & Ireland. In addition to its sales of licences for Dassault Systèmes software applications, the Group also provides selected services, mainly to large customers. These services comprise consulting services with regard to methods and criteria for design, deployment and support, training services and engineering services.

This document sets out the Group’s tax policy and approach in managing its tax affairs. It will be reviewed annually by the Tax Department and authorised by the Board of Directors of all qualifying UK Sub-Groups.

## Tax governance and risk management

A dedicated team of skilled tax professionals with extensive knowledge and expertise of international & UK specific tax matters (the “Tax Department”) based at the UPC, has the mission to support the Group from a tax standpoint in all matters that could have a tax impact. The Tax Department participates regularly in internal and external training, notably on tax matters. The Tax Department also provides tax training to different stakeholders of Dassault Systèmes, keeping them aware of any new tax regulations and of Dassault Systèmes general Tax policy.

From a governance standpoint, the Head of Tax reports into the Group Chief Financial Officer (CFO) & Chief Executive Officer (CEO) and can escalate any material judgement on tax compliance or breach in a timely manner if necessary. The Head of Tax supervises directly

all members of the Tax Department. At least once a year, the Head of Tax presents strategic tax topics to the Audit Committee.

The Tax Department aims to develop close partnerships with the Group entities to provide clear, relevant and timely guidance on tax matters, including identification of tax risks and opportunities. The Tax Department is usually involved in projects from planning to implementation to ensure that appropriate tax treatment is consistently applied and tax exposures are managed. The Tax Department also establishes all necessary processes and controls to ensure the proper implementation of Dassault Systèmes Tax Policy publicly available at: [Governance | Sustainability Commitment - Dassault Systèmes \(3ds.com\)](https://3ds.com)

Where relevant the Tax Department liaises with the local finance & tax teams of the respective Group entities to ensure compliance with local regulatory requirements. Furthermore, the Tax Department will seek to obtain external tax advice from qualified professional services organisations in matters that require specialised knowledge and expertise that is not available within the team.

## **Attitude towards tax planning and level of risk the Group is prepared to accept**

The Group believes that it is important to pay the correct amount of tax at the right time and at the right place under all relevant laws and regulations. Taxes follow business with the profit allocated to countries where value is created. The Group applies the arm's length principle consistently across the business defining prices in line with the guidelines issued by the OECD.

The Group entities do not engage in artificial transactions that lack economic substance or the sole purpose of which is to reduce the tax burden. The Group may consider undertaking transactions in a way that is most favourable from a tax perspective providing this is compliant with the different applicable tax legislations and is aligned to the Group's business objectives of ethical & sustainable growth that is supported by a transparent & responsible Tax Policy (reference above). The Group does not engage in tax planning if the underlying business objectives do not support the position, or if the arrangements impact upon the Group's reputation, brand, corporate and social responsibilities, or future relationships with the Tax Authorities.

Where there are areas of uncertainty and risk on which it is required to make a decision - the Tax Department tries to assess, monitor and manage these risks to ensure they are reduced to a minimal level, in line with the Dassault Systèmes Tax Policy tax objectives and policy. Where appropriate, the Tax Department looks to engage with local tax authorities to disclose and resolve issues, risks and uncertain tax positions.

Where there is material doubt as to the tax treatment of any particular transaction, the Group proceeds on the basis of tax advice provided from qualified professional services organisations, and if needed the local Tax Authorities to validate the transaction.

The Group utilizes tax reliefs and allowances available in the manner in which it was intended by the local Tax Authorities, regulation & law. The Group benefits from tax incentives offered by the UK Government to support investment including in R&D (RDEC). They are implemented according to the relevant legislations and regulations and are aligned with the Group's business & operational objectives.

Finally, both Group & the UPC neither encourage nor promote tax evasion.

## **Relationship with HM Revenue & Customs (HMRC)**

The Group companies, from their respective incorporation dates, have always maintained a transparent and constructive relationship with HMRC to meet statutory and legislative tax requirements

The Group in the UK and by extension the UPC is committed to being transparent with HMRC on current, future and past tax risks across all relevant taxes and duties through fair, accurate and timely disclosure in correspondence and returns, including responding to queries and information requests in a timely fashion.