

# Dassault Systèmes

## UK Tax Strategy



**3DEXPERIENCE®**

Dassault Systèmes (“DS”) provides businesses and people with virtual universes to imagine sustainable innovations. Its 3DEXPERIENCE Platform leverages DS’ world-leading 3D software applications to transform the way products are designed, produced, and supported, enabling businesses to craft delightful customer experiences.

DS is a group headed by Dassault Systèmes SE, a listed European company (the “Group”), with a worldwide activity including in the UK where there are several subsidiaries.

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.

## **Tax governance and risk management**

A dedicated team of skilled tax professionals with extensive knowledge and expertise of international tax matters (the “Tax Department”), led by the Head of Tax, has the mission to support the Group from a tax standpoint as business partner.

The Head of Tax is under the responsibility of the EVP Group Finance who reports to the Executive Vice President & Chief Financial Officer and Corporate Strategy Officer of the Group.

The Tax Department aims to develop close partnerships with the Group’s businesses, to provide clear, relevant and timely guidance on tax matters, including identification of tax risks and opportunities, if any, and relies on external tax advice if needed. 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.

Where there are areas of uncertainty and risk on which it is required to take a stance, the Tax Department tries to assess, monitor and manage these risks to ensure they are reduced to a minimal level, in line with the Group’s tax objectives and policy. Where appropriate, the Tax Department looks to engage with tax authorities to disclose and resolve issues, risks and uncertain tax positions.

## **Attitude towards tax planning and level of risk DS group is prepared to accept**

In every jurisdiction, including the UK, the taxes follow business, and the profit is allocated to countries in which value is created, in accordance with domestic and international rules and standards (such as the OECD Guidelines including BEPS principles) and applying the arm’s length principle.

The UK DS companies do not engage in artificial transactions, the sole purpose of which is to reduce the tax burden. Besides, the Group may consider undertaking transactions in a way that is most favorable from a tax perspective providing this is aligned to the Group’s business objectives and is compliant with different tax legislations. 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.

DS Group utilizes tax reliefs and allowances available in the manner in which it was intended by the tax authorities and statute.

In principle, where there is material doubt as to the tax treatment of any particular transaction, the Group generally proceeds on the basis of tax advice provided from leading tax practitioners to validate the transaction.

## Relationship with HMRC

DS Group aims to establish an open and constructive dialog with the UK tax authorities on the basis of disclosure of all relevant facts and circumstances.

The Group commits to make fair, accurate and timely disclosure in correspondence and returns, and respond to queries and information requests in a timely fashion. The Group seeks to interpret the relevant tax rules in a reasonable way, and ensure transactions are structured consistently with a co-operative relationship.

The publication of Dassault Systemes' UK Tax Strategy complies with the requirements of Finance Act 2016 Schedule 19 Part 2 for the financial year ending 31 December 2018 and remains in force until superseded. The strategy applies to all UK entities of the Dassault Systemes Group headed by Dassault Systemes SE.