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ITC Infotech Limited (ITC Infotech) Tax Strategy – financial year ending 31 March 2021

Introduction

ITC Infotech is a wholly owned subsidiary of ITC Infotech India Ltd., which is a specialized global full service technology solutions provider, led by Business and Technology Consulting. ITC Infotech infuses technology with domain, data, design, and differentiated delivery to significantly enhance experience and efficiency, enabling our clients to differentiate and disrupt their business. ITC Infotech is part of the larger ITC group, which is one of India's foremost multi-business enterprises with a market capitalization of nearly US \$ 38 billion and a consolidated turnover of approx. US \$ 10.8 billion. ITC group's aspiration to create enduring value is manifested in its robust portfolio of businesses encompassing Fast Moving Consumer Goods, Hotels, Paperboards & Specialty Papers, Packaging, Agri-Business and Information Technology.

As a result of ITC Infotech's business activities in the UK, the Company is liable to a variety of taxes. ITC Infotech pays corporation tax and VAT in the UK. In addition, the Company collects and pays employment taxes through Pay As You Earn ('PAYE').

ITC Infotech is committed to complying with tax laws in a responsible manner and having an open and transparent relationship with tax authorities. We seek to build and sustain relationships with governments and fiscal authorities that are constructive and based on mutual respect. This paper sets out the tax strategy of ITC Infotech and by making this strategy available, ITC Infotech is fulfilling its responsibilities under schedule 19 of the Finance Act 2016 (i.e. duty to publish tax strategy).

ITC Infotech's tax strategy reflects its status as a responsible corporate citizen, which is underpinned by a strong governance framework. The tax strategy also requires compliance with local laws, regulations and guidance as well as international tax laws, wherever applicable.

This tax strategy disclosure will be reviewed annually and updated when necessary. The Finance team of ITC Infotech will be responsible for the management of taxes and any risks involved with the implementation of the strategy.

Approach to Tax Risk Management

ITC Infotech is committed to conduct its tax affairs efficiently and in consistency with the following objectives:

- a. Comply with all relevant laws, rules, regulations, reporting and disclosure requirements through a robust system of controls, reviews by competent senior managers and, when required, qualified external consultants
- b. Apply professional diligence and care in the management of all risks associated with tax matters, ensure governance and assurance procedures are appropriate
- c. Foster constructive, professional and transparent relationships with tax authorities, based on the concepts of integrity, collaboration and mutual trust



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Opinion on Tax Planning

ITC Infotech undertakes tax cost management using legitimate and reasonable tax positions in full compliance with UK tax laws and transfer pricing regulations that supports our business and reflects commercial and economic substance. The Company does not seek to take any aggressive tax positions. We adhere to relevant tax laws and seek to minimize the risk of uncertainty or disputes.

We conduct transactions between ITC Infotech group companies on an arm's length basis and in accordance with acceptable international tax norms based on inputs received from qualified professional advisors. The Company is subject to the Country by Country reporting obligations and the master file filings are to be made by ITC Limited, the ultimate parent company.

Tax Risk Management

ITC Infotech follows risk management systems as part of the internal control processes. We identify, assess and manage tax risk and account for taxes appropriately. We implement risk management measures including controls over compliance processes and monitor their effectiveness. ITC Infotech seeks to achieve its aim of low tax risk through the following:

- Submission of tax returns on timely basis with an adequate supporting audit trail and sign off process
- Paying appropriate amount of tax at the right time
- Maintain tax accounting arrangements which are robust and accurate
- Ensuring that department(s) which are involved in company's tax processes are adequately and appropriately resourced
- Periodic reporting of compliance for key taxation related matters to management

Interaction with HM Revenue and Customs (HMRC)

ITC Infotech is committed to the principles of openness and transparency in its approach to dealing with HMRC. All dealings with the tax authorities and other relevant bodies will be conducted in a collaborative, courteous and timely manner. The aim would be to strive for early agreement on disputed matters and to achieve certainty wherever possible. In particular, ITC Infotech endeavours to:

- Adopt open and collaborative professional relationship at all times with HMRC
- Where appropriate, engage in meaningful dialogue with HMRC on relevant taxation matters
- Make fair, accurate and timely disclosures in correspondence and returns, respond to queries and information requests in a timely fashion and work with HMRC to mutually resolve issues wherever possible

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