

## 2025 Tax Strategy

### **Alcatel Submarine Networks UK Ltd (“ASN UK”) Tax Strategy**

This tax strategy is published in accordance with the relevant provisions of Schedule 19 of Finance Act 2016 and is relevant for the year ending 31 December 2024 and, for tax planning matters, the year ending 31 December 2025. ASN UK regards this publication as complying with the duties set out under paragraph 19 (2) of that Schedule. All references to tax are in relation to UK taxation. ASN UK’s strategy is to be compliant with the applicable laws and regulations in the countries in which it operates, to mitigate inherent tax risks and to enhance and protect its reputation. This tax strategy was approved by the Board of ASN UK on 03 February 2025.

### **Approach of the Company to risk management and governance arrangements in relation to UK taxation**

Day to day responsibility for compliance with local tax laws and regulations, and the active monitoring and management of tax risks, is delegated to the UK and International Tax Manager, who reports to the Director of Tax for the Alcatel Submarine Networks (a French simplified stock corporation of which ASN UK is a subsidiary)(“ASN”) and is supported by tax professionals and Finance Managers employed by ASN UK as well as the wider business and commercial teams both within ASN. ASN UK’s performance against the standard is tested annually by the ASN’s Internal Audit Department. The teams are sufficiently trained/qualified and have the necessary skills and experience to apply the approach set out in the tax strategy and follow the processes and procedures in place to mitigate risk. Where ASN’s tax position is unclear or complex, advice from external professional advisors is obtained. Such advisors are also used to aid those charged with tax governance and ensure that they are kept abreast of any change in tax legislation that affects the group. ASN UK’s tax strategy is aligned to ASN risk and control framework.

### **Attitude towards tax planning & Risk Appetite**

It is recognised as a matter of principle that ASN UK has a responsibility to pay an appropriate amount of taxes in each of the jurisdictions in which it operates. This is balanced with the overarching objective to derive sustainable economic value from the business activities of the group. Where applicable, ASN UK will seek to utilise tax incentives and reliefs which are statutorily available, e.g. R&D credits, to support the long-term development of the group. ASN UK does not participate in any marketed tax avoidance schemes or any arrangements which have no commercial basis.

ASN UK has a conservative attitude to tax planning. The tax risks (both operational and transactional) are considered as part of ASN's broader risk management framework. Tax planning issues are reviewed consistently within the UK and with ASN's Director of Tax in the early stages of any projects, following through to their conclusion. When needed we involve external resource to propose tax solutions with the internal tax department confirming the viability of the solution. Well documented materials are then produced and stored to ensure full transparency. ASN UK will not adopt a tax position which is analogous with an aggressive interpretation of the tax laws.

### **Relationship with HM Revenue & Customs**

ASN UK aims to fully comply with all tax filing, reporting and payment obligations. It is ASN UK's intention to maintain good effective working relationships with HM Revenue & Customs through a collaborative approach which is open, honest and transparent. The appetite for risk is low and ASN UK seeks to fully engage in respect of any enquiries/investigations through timely and complete information flows and communication.