

Approach to Taxation

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Introduction

AstraZeneca is a global, science-led biopharmaceutical business. We are one of only a handful of companies to span the entire life-cycle of a medicine from research and development to manufacturing and supply, and global commercialisation of primary care and specialty care medicines. AstraZeneca operates in over 100 countries and its innovative medicines are used by millions of patients worldwide.

Our business activities around the world incur a substantial amount and variety of business taxes. We pay corporate income taxes, customs duties, excise taxes, stamp duties, employment and many other business taxes where applicable in the jurisdictions in which we do business. In addition, we collect and pay employee taxes and indirect taxes such as Value Added Tax (VAT).

The taxes we pay and collect represent a significant contribution to the countries and societies in which we operate.

We operate policies and governance to ensure compliance with tax laws in the territories in which we do business. We are committed to transparent and constructive relationships with all relevant tax authorities. We support initiatives to increase public trust and transparency in national and international tax regimes, and we engage with our stakeholders to build understanding and clarity of business tax consequences wherever we operate.

AstraZeneca's Values, incorporated in our [Code of Ethics](#) are the foundations for our approach to taxation. We aim to pay the right amount of tax in compliance with all relevant tax law and regulations and do not tolerate tax evasion or facilitation of tax evasion. This approach to taxation applies in the UK and every country in which we operate globally.

To fulfil the requirements under UK lawⁱ, and to support transparency of our approach to taxation, this document sets out:

- Our approach to governance, risk management and compliance.
- Our approach to tax planning.
- Our approach towards dealings with Tax Authorities.
- The level of tax risk we are prepared to accept.

Governance, risk management and compliance

Tax risk can arise from unclear laws and regulations as well as differences in interpretation. As is common for many multinationals, AstraZeneca's most significant source of uncertainty arises where two or more governments adopt different interpretations in relation to pricing inter-company cross border transactions (i.e. the transfer pricing of goods and services between affiliated members of the AstraZeneca group of companies resulting in the same income being taxed in two or more territories).

Our approach is to manage tax risks and tax costs in a manner consistent with applicable regulatory requirements and with shareholders' best long term interests, taking into account operational, economic and reputational factors.

We have established and maintain robust policies and compliance processes to ensure the integrity of our tax returns, and timely and accurate tax payments in all countries in which we operate.

This includes ensuring that our tax professionals and staff have the necessary training to manage our tax position appropriately.

Our approach to taxation is reviewed periodically in light of changes to:

- The general business environment.
- Our business operations.
- Tax laws and regulations (national and international).
- Emerging business and tax risks.

We maintain documented tax policies and procedures in relation to key tax processes (e.g., transfer pricing and export controls). These are reviewed annually.

Tax forms a part of AstraZeneca's wider business risk and governance processes. Tax risk is monitored and managed through an experienced tax team and overseen by the Group CFO and the Audit Committee (which comprises members of the AstraZeneca Board of Directors).

Business tax processes are subject to the same level of robust internal controls, risk management, assurance processes, Code of Conduct and external audit as the rest of the AstraZeneca business.

Additional assurance is gained from Internal Audit Services' reviews of tax risk management processes from time to time. Performance is monitored via quarterly reporting to the Group CFO and Group Audit Committee, which may include review of significant tax matters as set out in our Annual Report.

Tax planning

Substantive business transactions, for example acquisitions and divestments, intragroup trade and expansion in global markets, determine our approach to tax planning and consequent tax liabilities.

This means that business factors and requirements lead the business structures and consequently our tax approach. We access government sponsored tax incentives where appropriate and in line with substantive business activities (e.g., UK patent box and R&D tax credits). As part of our risk management processes, we may request external advice to inform our tax positions where matters are significant or are open to interpretation.

We apply the OECD guidelines, UK and other national legislation to our inter-company transactions and intellectual property ownership, which is aligned to substantive business activities.

Approach in dealings with Tax Authorities

We seek to develop and maintain professional and transparent relationships with tax authorities.

We engage with transparency and ensure there is access to relevant information demonstrating the integrity of our tax processes, returns and payments. We prepare a report which shows our revenue, profit and tax paid by territory which is submitted to UK tax authorities and is available to other tax authorities through their information exchange protocols.

We also engage with governments on proposed changes to tax legislation where appropriate, either directly or via representative bodies.

The level of tax risk we are prepared to accept

The company's approach to tax risk is integrated within our broader business risk management and compliance framework. Our focus is on the discovery, development and commercialisation of prescription medicines to meet our commercial strategic objectives. The tax department works alongside the business organisation to provide input to and manage tax risks in the context of substantive business transactions.

AstraZeneca's processes, policies and governance operate to ensure compliance with tax laws and regulations in the territories where we operate and are designed to identify and mitigate material tax risks. In the event that applicable laws and regulations are subject to interpretation, we seek appropriate assurance regarding the position taken (e.g., in relation to transfer pricing matters through advance pricing agreements or intra-government mutual agreement procedures).

AstraZeneca requires all employees to comply with relevant and applicable laws and regulations and behave in accordance with the AstraZeneca [Code of Ethics](#).