



Lupin Healthcare (UK) Ltd. (formerly Lupin (Europe) Ltd.)

Tax Strategy

Background

Lupin Healthcare (UK) Ltd. (LHUL) (formerly Lupin (Europe) Ltd), is part of Lupin group an innovation led transnational pharmaceutical group of companies developing and delivering a wide range of branded & generic formulations, biotechnology products and APIs globally. Lupin group companies are involved in the manufacture of products for both the UK and other international markets, as well as the supply of pharmaceutical products into the UK market. Lupin Ltd, India (Lupin) is ultimate holding company of LHUL.

The purpose of this document is to set-out Lupin's strategy toward UK taxation and has been prepared in accordance with the requirements of the Finance Act 2016 Schedule 19, paragraph 16(2).

The document covers:

- A. Our approach to tax risk management and governance
- B. Our attitude towards tax planning
- C. The level of tax risk that we are prepared to accept; and
- D. Our approach to dealings with HMRC.

In overview, we peruse a tax strategy that is principled, transparent and sustainable in the long term. Our values and Code of Business conduct (which can be found on Lupin's website), underlie our approach to taxation, and we address items A to D below.

A. Tax risk management and governance

Tax risk, and particularly the reputational component, extends beyond Lupin's relationship with tax authorities it also affects our relationship with staff, management and all the shareholders.

Like any other risk that our business faces it should be identified, controlled and reported upon. Tax positions and risks associated with them can be uncertain and we manage these by:

1. Maintaining a cooperative relationship with HMRC;
2. Having strong technical support for tax positions, including opinions from external advisors as well as documenting such positions with accurate facts; and
3. Maintaining strong compliance procedures ensuring accurate and complete tax returns, including robust and well documented transfer pricing documentation.

Business tax processes are subject to internal controls and external assurance processes. Performance is monitored via regular reporting to the EMEA Finance Director. We obtain support and advice from appropriately qualified external advisors on decisive tax matters regarding the UK. We believe that the input of external advisors as a key source of expertise to supplement the skills of our finance team.



B. Attitude to tax planning

Tax is a decisive factor in many business arrangements and tax planning in support of commercial activity is appropriate and a must. Lupin does not engage in aggressive tax planning, that is planning that has been defined by the OECD as:

- Planning involving a tax position that is tenable but has unintended and unexpected tax revenue consequences; or
- Taking a tax position that is favourable to the taxpayer without openly disclosing that there is uncertainty as whether significant matters in the tax return accord with the law.

Lupin Healthcare (UK) Ltd. receives guidance and support from Lupin's EMEA and Global tax teams. Additionally, it may engage external tax advisors to supplement the tax expertise skills of the local finance team as needed.

C. Tolerance to Tax risk

Lupin takes a conservative approach in taxation matters. We are willing to accept a low level of risk and taxes are managed with the objective that all tax liabilities properly due under the law are correctly recorded, accounted and paid for within the accepted deadlines.

D. Approach to dealing with HMRC

Lupin considers HMRC as a key stakeholder in our business. As such we work cooperatively and transparently with HMRC, including that they have access to relevant information evidencing taxation matters.