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## Tax Strategy for TransUnion UK

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### Scope of the Strategy

This strategy has been developed in accordance with paragraphs 19 and 25 of Schedule 19 to the Finance Act 2016. It applies to the group of companies listed as the end of the document. In this strategy, all references to 'TransUnion UK' or 'the group' are to all of these entities. The strategy does not apply to entities within this group which are not registered in England and Wales. This strategy applies for the 12 months ending 31 December 2021. References to 'UK Taxation' are to the taxes and duties set out in paragraph 15(1) of the Schedule to the Finance Act 2016 which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Land Tax. References to 'tax', 'taxes' or 'taxation' are to UK taxation.

### Aim of the Strategy

TransUnion UK is committed to manage the tax position of the group in full compliance with all applicable laws and regulations and further, within the spirit of those laws, underpinned by an appropriate risk management and internal control framework, and an open and collaborative relationship with UK tax authorities.

### Governance

- The Board of directors for each legal entity has ultimate responsibility for each company's tax strategy and compliance with the same.
- The Board of directors delegates executive management of TransUnion UK to the Executive Committee (ExCo).
- The Chief Financial Officer (CFO) is the ExCo member with responsibility for tax matters and for ensuring that the tax strategy is considered in all significant business decisions.
- Day to day management of tax affairs is delegated to appropriately qualified senior finance managers reporting to the CFO, each with clearly defined roles and responsibilities in relation to taxation.

### Risk Management and Tax Planning

- TransUnion UK operates a system of tax risk assessment and controls as part of the overall risk management and internal control framework within the firm's financial reporting and management systems.
- TransUnion UK seeks to mitigate the level of tax risk arising from its operations as far as reasonably practicable by ensuring that reasonable care is applied in the design and operation of all processes related to tax compliance.
- TransUnion UK monitors tax risks for business and legislative changes, in conjunction with retained leading professional advisors, from whom advice is sought where appropriate.
- TransUnion UK's appetite to tax risk is low and risks are managed to ensure compliance both with legal requirements and the spirit of the law, to ensure payment of the correct level of tax and to uphold the reputation of the business.
- TransUnion UK takes a conservative approach to tax planning and will only utilise available tax incentives, reliefs and exemptions for the purposes for which they were intended.

### Dealings with HMRC

- TransUnion UK seeks to have a transparent and collaborative professional working relationship with HMRC.
- TransUnion UK ensures that HMRC is kept aware of significant changes in the business and seeks to discuss any significant matters with HMRC prior to submission of any final documentation.

- When submitting tax returns to HMRC, TransUnion UK discloses all relevant facts and identifies any non-standard transactions. Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.

Entities covered by this Tax Strategy.

TransUnion International UK Limited	Trading Entity
TransUnion Information Group Limited	Trading Entity
Callcredit Marketing Limited	Trading Entity
Iovation Limited	Trading Entity
Signal (UK) Limited	Trading Entity
Vail Holdings UK Limited	Holding Company
TransUnion UK Holdings UK Limited	Holding Company
TransUnion Global Holdings LP	Holding Company
Crown Acquisition Bidco Limited	Holding Company
*Callcredit Public Sector Limited	Ceased to trade. Final tax computations will be submitted in 2021.
*DecisionMetrics Limited	Ceased to trade. Final tax computations will be submitted in 2021.
*Callcredit Data Solutions Limited	Ceased to trade. Final tax computations will be submitted in 2021.
*Callcredit Lead Generation Limited	Ceased to trade. Final tax computations will be submitted in 2021.
*Coactiva Limited	Holding Company
*Crown Acquisition Consumer Limited	Holding Company
*Crown Acquisition Midco 2 Limited	Holding Company
*Crown Acquisition Midco Limited	Holding Company
*Crown Acquisition Topco Limited	Holding Company
*DMWSL 617 Limited	Dormant Company
*DMWSL 618 Limited	Dormant Company
*DMWSL 619 Limited	Dormant Company
*DMWSL 620 Limited	Dormant Company
*Tenant ID Limited	Dormant Company

\*Company due to be struck off during 2021.

This strategy was approved by the Board on 5 May 2021.
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