

Language Line Solutions UK Tax Strategy

Introduction and Context

Language Line Solutions UK (LLS-UK) with £17.9m revenue in 2016 is a subsidiary of its ultimate parent company in France Teleperformance SE (TPSE). TPSE has a global turnover in excess of €4b and employs over 200,000 people worldwide, 8,500 within the UK.

We have in accordance with the Finance Act 2016, schedule 19, paragraph 16 (2) produced the following tax strategy which covers all taxes the company pays (Corporation Tax, VAT, PAYE and other miscellaneous taxes). It is effective for the financial year ended 31 December 2017.

Approach toward governance and risk management in relation to UK taxation

Governance. *The ultimate parent company (TP SE) is responsible for the UK Group's governance framework and reporting to the shareholders.*

Risk Management *responsibility and implementation of the LLS-UK tax strategy ultimately rests with the Group's Executive Board, delegated to the CFO in the US and subsequently to the UK Financial Controller at Language Line who is responsible for the day to day finance function.*

The Financial Controller reports to the UK Managing Director and CFO in the US on tax matters pertaining to tax liabilities and any tax issues and queries with the support of the external tax advisors.

Considering the size and nature of our business which exists at a single location, we believe the following to be the main areas of focus to mitigate tax risks:

- **Tax compliance and reporting risks:** *LLS-UK has established internal control procedures in place, with an important role played by external advisers in the compliance process. This ensures timely and accurate preparation and submission of the UK tax returns in relation to all UK taxes.*
- **Transactional risk:** *All business or commercial changes are consulted with the finance team before they are implemented to ensure compliance and assess potential tax implications for the company.*
- **Legislative changes:** *Any tax changes with potential effects on the company's tax compliance are analysed and implemented by the finance team. Complex cases are raised and discussed with external UK-tax advisers and the US-CFO.*

Attitude towards Tax Planning

LLS-UK acknowledges its responsibility to act in an ethical and professional manner with regard to paying the correct amount of tax in a timely manner, ensuring it is compliant with all tax laws and any inter-group transactions are documented and executed under the arm's length principle.

We adhere to relevant tax law and seek external advice when the in-house finance team needs assistance with interpretation of complex tax law.

Level of risk in relation to UK taxation that Language Line is prepared to accept

LLS-UK does not actively participate in overly complex or high risk tax schemes and has no plans to do so in the future.

It also actively monitors business practices to ensure that potential instances of fraudulent tax evasion are avoided in all areas of company taxation.

Approach towards dealing with Her Majesty's Revenue & Customs (HMRC)

LLS-UK does not have a tax specific Customer Relationship Manager due to its size, however it seeks to have a professional, open and transparent relationship with HMRC.

If any questions are raised by HMRC we will seek to respond in an open and timely manner. Also, and where appropriate, the company adopts a voluntary disclosure approach.

LLS-UK remains committed to stay compliant with all its tax responsibilities such as filings, reporting and payments. We will seek professional external advice where the interpretation of tax law is new, complex or unclear.