

EY GDS UK tax strategy

June 2026



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The better the world works.



Shape the future
with confidence

EY values and the commitment to building a better working world drive GDS's tax strategy

Scope

This tax strategy applies to EY GDS Holdings Coöperatief U.A. (GDS Co-op) and all its wholly owned subsidiaries, collectively "GDS". It is effective from the date of publication until it is superseded. GDS Co-op is a Dutch-incorporated entity, which is tax resident in the UK. A list of GDS Co-op's subsidiaries is shown on page 3 of this strategy document.

The principal activity of GDS is the coordination and provision of Global Delivery Services, specifically client-related services and business enablement services. GDS only provides services to EY Member Firms and other global EY network entities and does not provide services directly to external clients.

The global delivery services

These services are coordinated by GDS Co-op's UK subsidiaries, EY GDS (CS) Limited (for client-related services) and EY GDS (ES) Limited (for business enablement services) and provided by GDS Co-op's other operating subsidiaries. GDS provides its services on a limited risk basis.

The GDS entities pay tax in their jurisdiction of tax residence, and in other countries where they have a taxable presence. While this strategy relates to GDS's UK activities only, we apply the same principles in relation to non-UK taxes. In particular, we work closely with tax authorities in a cooperative manner, where possible, based on local practice and custom.

The GDS entities tax resident outside of the UK operate in accordance with the principles outlined in this document and as per their local tax strategies, if any.

This document relates only to the tax strategy of GDS – not EY Member Firms, who are responsible for their own tax strategies.

GDS Co-op, EY GDS (CS) Limited and EY GDS (ES) Limited publish this document in satisfaction of their duties under paragraphs 22 (2) and 19 (2) of Schedule 19 of Finance Act 2016 for the year ending 3 July 2026.

Shape the future with confidence

EY is building a better working world by creating new value for clients, people, society and the planet, while building trust in capital markets. Enabled by data, artificial intelligence (AI) and advanced technology, EY teams help clients shape the future with confidence and develop answers for the most pressing issues of today and tomorrow.

As part of our membership in the World Economic Forum's International Business Council (WEF-IBC), the EY network's performance against the WEF-IBC Stakeholder Capitalism Metrics is outlined in EY Value Realized.

For the EY network, one key stakeholder group is the tax authorities. Principally for GDS Co-op and its UK subsidiaries, this is His Majesty's Revenue and Customs (HMRC) with whom we seek to maintain a positive and transparent relationship. We therefore welcome the opportunity to publicly outline our tax strategy as a business.

GDS's tax principles

Our objective is to pay the right amount of tax at the right time to meet our statutory obligations. We seek clarity and certainty on tax matters wherever feasible. When dealing with the tax affairs of GDS, we focus on:

- Being on time and in compliance with our tax filing and tax payment obligations
- Effectively managing our risks
- Working closely with HMRC in a cooperative manner on a real-time basis
- Maintaining a tax strategy which is fully supported and owned by the board of GDS Co-op
- Aligning our tax affairs to the commercial activity of the services we provide
- Demonstrating EY values at the heart of everything we do

Our reputation is built by our people acting according to the EY values

Governance and conduct

Our tax strategy is approved and owned by the board of GDS Co-op.

Our internal tax team has a clear accountability to the board for the management of tax arising from our business operations.

Our internal tax team has a clear mandate from the board to act in a way aligned to EY values, which define who we are:

- People who demonstrate integrity, respect and teaming
- People with energy, enthusiasm and the courage to lead
- People who build relationships based on doing the right thing

The board's mandate is for GDS Co-op to behave in accordance with the low-risk characteristics as set out in HMRC's Business Risk Review+ process. The board has a zero-tolerance policy for tax evasion and its facilitation, and we have established procedures designed to prevent acts of tax evasion or its facilitation being committed by our people and those who provide services for or on behalf of the GDS Co-op.

Commercial attitude to tax planning

We undertake transactions which are commercially driven and do not put in place artificial or contrived arrangements that could give rise to reputational damage for GDS.

We structure our businesses from a commercial perspective to identify and appropriately manage any tax risks arising from them.

We seek to align our tax affairs with their commercial and economic substance in compliance with the tax laws of the jurisdictions in which we operate.

We claim tax reliefs and credits that are aligned with the tax laws under which we operate.



Compliance and effective risk management

Compliance is at the heart of what we do, and we focus on staying compliant with our tax filing and tax payment obligations.

GDS's business is of a significant scale, and we deal with a large volume of complexity in the tax systems in the jurisdictions in which we operate. In seeking to be responsible taxpayers, we seek advice from the appropriate internal and external tax professionals to manage our risks and compliance positions, so we can pay the right tax at the right time.

We have clearly documented processes and controls relating to the management of our tax compliance processes.

Our internal tax team has clear roles defined by their areas of process and tax experience. The team reports to the Global Chief Tax Officer who, in turn, reports to the board.

Our internal tax team keeps up to date with legislative changes through training and continuing professional development.

Cooperative approach with HMRC

GDS maintains an open and honest dialogue with HMRC, and we do so on a timely basis.

We meet and correspond with HMRC regularly throughout the year and keep abreast of tax developments.

We keep HMRC informed of significant transactions and business changes, and disclose and discuss areas of significant uncertainty in how the legislation applies.

We communicate our positions based on full disclosure of the relevant facts and legislative position.

Where we have uncertainty in how the underlying legislation applies, we seek to resolve the matter through an open and honest dialogue.

List of subsidiaries as at June 2026

- EY GDS (CS) Limited (UK)
- EY GDS (ES) Limited (UK)
- EY Global Delivery Services (UK) Limited (UK)
- EY GDS US Holding Company Limited (UK)
- Riverview Law Limited (UK)¹
- EY Global Delivery Services India LLP (India)
- Pangea3 Legal Database Systems Private Limited (India)
- EYGBS (India) LLP
- EY GDS (CS) Philippines Inc (Philippines)
- Ernst & Young Global Services (Philippines) Inc (Philippines)
- EY GDS (CS) Poland Sp. z o. o. (Poland)
- EY Global Services (Poland) Sp.z.o.o. (Poland)
- EY GDS (CS) Argentina S.R.L. (Argentina)
- EY Global Services (Buenos Aires) S.R.L. (Argentina)
- EY GDS CS Mexico, S.C (Mexico)
- EY GDS Mexico Holding, SA de CV (Mexico)
- EY GDS (CS) Lanka Private Limited (Sri Lanka)
- EY GDS (CS) Hungary Kft (Hungary)
- EY Global Delivery Services US LLC (US)
- Malaga Excellence and Technology S.L. (Spain)

1. In liquidation with effect from 1 March 2024.

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EY is building a better working world by creating new value for clients, people, society and the planet, while building trust in capital markets.

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All in to shape the future with confidence.

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