



January 7, 2020

NCR UK Group Limited Tax Strategy

NCR UK Group Limited and its affiliates¹ (“NCR UK”) regard the publication of this tax strategy as complying with paragraph 16(2) of Schedule 19 of the Finance Act 2016 to publish UK tax strategy. This document has been approved by the NCR UK Group Limited’s Board of Directors. It sets out NCR’s policy and approach to conducting its tax affairs and dealing with tax risk. This document is periodically reviewed by the NCR global tax department and any amendments are approved by the NCR UK’s Board of Directors.

1. The approach of the group to risk management and governance arrangements in relation to UK taxation

A. Governance arrangement

Responsibility for the tax strategy, the supporting governance framework and management of tax risk ultimately rests with NCR’s global Vice President of Tax. Day-to-day responsibility for each of these areas rests with senior tax associates. NCR UK’s tax strategy aligns with NCR UK’s wider risk and control framework. The key tax risks are escalated to and considered by NCR UK’s Board of Directors.

B. Risk Management

NCR UK’s management of its tax risks is similar to the way it manages any other areas of operational risks. The business is supported by oversight functions, including tax, controllership, and internal audit departments. NCR UK’s tax department continues to review its deployment of resources and headcount as the scale and complexity of the business evolves. Where appropriate, the NCR UK’s tax department engages with tax authorities to disclose and resolve issues, risks and uncertain tax positions. The subjective nature of tax legislations means that it is often not possible to mitigate all known tax risks. As a result, at any given time, NCR UK may be exposed to financial and reputational risks arising from its tax affairs.

2. The attitude of the group to tax planning (so far as affecting UK taxation)

¹ The affiliates of NCR UK Group Limited are as follows: NCR Limited, NCR Financial Solutions Group Limited, Radiant Systems UK (II) Limited and Radiant Systems Limited.

NCR UK has an obligation to pay appropriate amounts of tax as required by law. NCR UK balances this obligation with its responsibility to its shareholders to conduct its business affairs in a fiscally responsible manner. The tax planning is driven by substantial business needs. The economic benefits associated with tax planning do not override compliance with all applicable laws. NCR UK's tax department ensures that tax planning is well-researched, understood, and based on established tax laws.

3. The level of risk in relation to U.K. taxation that the group is prepared to accept

NCR UK's assessment of the tax risk requires that, where tax law is unclear or subject to interpretation, each adopted tax position is determined to be at least more likely than not to be sustained if challenged by tax authorities.

4. The approach of its dealings towards Her Majesty's Revenue and Customs ("HMRC")

NCR UK endeavors to comply with its UK tax filing, tax reporting and tax payment obligations. NCR UK's tax department is required to foster good relationships with HMRC, in particular NCR UK's tax department engages in the following activities:

- Pro-actively managing relationships with HMRC to minimize the risk of challenge, dispute or damage to NCR UK's credibility;
- Participating in any HMRC formal consultation process where it is expected that the matter under consultation will have a material impact on the NCR UK's tax liability or tax compliance management; and
- Regularly meeting with HMRC to discuss Business Risk Review.