

Syniverse's Tax Strategy in the UK

Syniverse is a leading global provider of technology and business services for a number of telecommunications companies, as well as a variety of other multinational enterprises. We make mobile work by connecting our customers to more than 1,500 mobile operators and enterprises in nearly 200 countries. We empower mobile operators and other enterprises to deliver enhanced, reliable mobile experiences with any mobile user – anytime, anywhere.

Syniverse's European operations are supported from a number of countries including the UK. Syniverse's UK businesses do not cover all aspects of the group's products and services. Our UK operations have a focus on financial clearing.

We endeavour to ensure the integrity of all reported tax numbers and to ensure compliance with all our tax obligations on a worldwide basis. We engage professional advisors to provide support in aligning our intra-group transactions to the internationally recognized arm's length principle.

Syniverse's approach to risk management and governance arrangements

In relation to UK taxation, tax management and governance is delegated to the VP of Finance, Tax & Treasury by the Chief Financial Officer ('CFO'). We have a centralized approval process in relation to tax payments. All tax returns are prepared by an outside service provider with the local finance team and reviewed by the VP of Finance, Tax & Treasury before submission. Key tax matters are discussed with the Audit Committee on an annual basis, or more frequently as required, and all significant tax risks are disclosed in the group's 10-Q and 10-K filings in the US. Where tax risks require remediation, action is taken by the VP of Finance, Tax & Treasury under the oversight of the CFO.

We will also seek professional advice on tax matters where needed to support the knowledge of the local and group teams.

Syniverse's attitude towards tax planning

Tax is one of the factors we consider when making business decisions, but the tax consequences follow the commercial transactions. At Syniverse, we do not undertake transactions driven solely by a tax planning purpose.

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

Consistent with our attitude to tax planning, we consider that our appetite and tolerance for tax risk in the UK is low. Any potential significant opportunity is evaluated by the CFO and reviewed by the Audit Committee. We strive to have an efficient tax structure, with minimal tax exposure, and seek professional advice and audit approval for our transfer pricing positions, to ensure alignment with the arm's length principle.

Syniverse's approach towards our dealings with HMRC

Syniverse has historically had only infrequent interactions with HMRC. However, when approached by HMRC for any tax queries, we aim to adopt an open and transparent attitude to resolve matters and reach agreement to achieve certainty on our tax positions in a collaborative and efficient manner.

This tax strategy applies to Syniverse's UK sub-groups / company in compliance with the corresponding paragraphs (detailed below) under Schedule 19, Finance Act 2016 and has been approved by Robert Reich as the Group CFO for the year ending 31 December 2017.

- ▶ UK sub-groups under Para 19(1):
 - Cibernet Limited (head of the sub-group) and Syniverse Technologies Limited
 - Syniverse Technologies Solutions Limited (head of the sub-group) and Syniverse Technologies (Financial Clearing) Limited
- ▶ UK company under Para 22(1):
 - Wholesale Clearing Solutions Limited

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For any queries, please contact Tom Ford – VP Legal International Operations at +352 277 56317