



Tax Strategy Statement

(for the year ending 31 December 2025)

This statement is published in satisfaction of applicable requirements of Schedule 19(2) of the Finance Act 2016 and applies to the following Orange Group entities, as listed below:

Orange Brand Services Limited
Orange International Limited (*dormant*)
Orange Participations UK Limited
Globecast UK Limited
Orange Business Holdings UK Limited
Orange Business UK Limited
SDH Holdco Limited
SensePost UK Limited (dissolved 1 August 2025)
Orange Cyberdefense UK Limited

These companies are hereafter collectively referred to as the “**Orange in the UK Companies**” or the “**Companies**” and individually as the “**Orange in the UK Company**” or the “**Company**”. The statement has been reviewed and approved by the board of directors of each of the Companies.

Tax risk management and governance

Tax risk management and governance processes are overseen by the Board of Directors of each Orange in the UK Company, with guidance and advice from in-house advisers and from external tax advisers where further expertise is required.

Each Company’s Finance Director and/or Senior Accounting Officer has primary responsibility for his/her Company’s taxation policy with the support of internal and external advisers who deal with tax forecasting and tax accounting (as well as Corporation Tax compliance).

The Orange tax department maintains oversight of tax compliance across the Orange Group and is closely associated with the Companies’ management and governance processes.

On an annual basis, the Orange in the UK Companies carry out a review for the purpose of completing the annual Senior Accounting Officer’s Certificate.

In operating their tax risk management and governance processes, Orange in the UK Companies have adopted a prudent approach with respect to their tax affairs and tax strategy. The Companies are committed to full compliance with their tax obligations, and to pay the correct amount of taxes.



Tax planning and tax risk

The Orange in the UK Companies do not seek to structure transactions in ways that yield tax results which are inconsistent with the underlying economic consequences of the transactions. The Orange in the UK Companies seek to ensure that their tax affairs remain consistent with a low risk approach, both in financial and reputational terms. Tax specialists within Orange work in collaboration with their operational partners to ensure the tax security of each transaction. They act within the framework of the Group's Tax Code of Ethics.

In this respect, the Companies have adopted a prudent approach with respect to their tax affairs and their tax strategy. Accordingly, they do their utmost to pay the correct amount of taxes within the required deadlines and in accordance with applicable arm's length principles.

To ensure that they correctly report their results in each jurisdiction where they operate, the Orange in the UK Companies carry out benchmark studies on a regular basis to identify arm's length pricing for cross-border flows of royalties and services, as required by the UK and other national authorities. Given the complexity and constant evolution of tax legislation, external tax advisers are consulted as needed to assist the in-house tax and local finance teams in ensuring compliance with tax legislation or in situations where there is any uncertainty regarding tax matters to ensure that tax laws are properly understood and applied. Our stakeholders have confidence in our ability to manage our tax affairs without any undue influence.

Relationship with HMRC

The Orange in the UK Companies openly and constructively engage with HMRC, in a spirit of mutual trust and co-operative compliance in respect of any past, present or future tax matters. The Orange in the UK Companies consider this to be the best way to ensure that the right tax is paid at the right time and to maintain a good working relationship with HMRC. Where appropriate and possible, the Companies will engage with HMRC on a timely basis in relation to any area of material uncertainty, including the interpretation of law, so as to minimize their tax risk and to provide greater certainty for both parties in advance of formal filings.