CyrusOne UK Tax Strategy

This tax strategy has been prepared for the UK entities\(^1\) in the CyrusOne group for the financial year ended 31 December 2021 and is published pursuant to paragraph 19(2), Schedule 19 Finance Act 2016.

Established in 2001, CyrusOne is at the forefront of the data centre industry as a respected leader and innovator. With 56 data centres around the world, including six in the UK, CyrusOne offers its partners colocation, cloud and connectivity services designed to meet the needs of businesses.

Headquartered in the USA, CyrusOne Inc. has been listed on the NASDAQ stock exchange under the symbol CONE since 18 January 2013.

CyrusOne Inc. takes seriously its Environmental, Social and Governance ("ESG") responsibilities, reflecting the company’s commitment to being a good corporate citizen. The company publishes a Sustainability Report annually. At all times CyrusOne Inc. seeks to comply fully with its regulatory and other obligations including taxation and to act in a way which upholds its reputation as a responsible corporate citizen.

**Approach to Tax Governance and the Management of Tax Risk**

The approach of the global CyrusOne group (The Group) to the management of tax risk and governance is ultimately set by the Board of Directors. The Group has established a framework for the management of tax with specific responsibility being delegated by the Board to the Vice President for Tax, who is based in the USA. At the UK entity level, the Accounting team who are led by the UK Finance Director is responsible for the day to day management of tax matters. Senior oversight is provided by the Head of Europe, who sits on the Executive Management Team.

The Group approach is to seek to manage its exposure to tax risk through the careful evaluation of the tax risks that may affect the business and by utilising its in house expertise, coupled with the use of qualified third-party professional advisers, to meet its objectives in mitigating the level of tax risk as far as possible.

Additionally, the Group maintains a strict scheduled process of control testing in order to ensure that its controls, including those in place for tax, are operating effectively. Controls are reviewed on a quarterly basis by its Internal Audit function, as part of the Group’s requirement to meet the testing and reporting requirements of the Sarbanes Oxley regime.

The business has a low tolerance to tax risk.

**Approach to Tax Planning**

The Group is committed to not undertaking transactions which are solely tax motivated. As a commercial business, it does however utilise tax reliefs and exemptions which are written into the tax statute to minimise its tax exposures in line with the approach of relevant tax authorities.

In order to ensure that tax planning is carried out in accordance with the Group’s approach, transactions require the approval of a member of the Board of Directors. The Group engages with

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\(^1\) CyrusOne UK Limited, CyrusOne UK TRS Limited, CyrusOne UK3 Limited, CyrusOne UK4 Limited, CyrusOne UK5 Limited, CyrusOne UK6 Limited, Zenium Management Limited, Zenium Technology Partners Limited, Zenium UK Limited, Zenium UK2 Limited
appropriately qualified professional firms to provide advice and to ensure compliance with UK tax law and regulations.

**Approach to relationship with the UK Tax Authority**

In the UK, the Group does not have access to a single point of contact at HM Revenue & Customs (HMRC) but is committed to meeting its obligations under the UK Taxes Acts to submit accurate and timely tax returns and tax payments.