

Brightstar 20:20 Group Tax Strategy December 2017



1. Introduction

Brightstar, a subsidiary of SoftBank Group Corp., is one of the world's leading specialised wholesalers in the wireless industry. Brightstar offers to mobile device manufacturers, mobile operators, retailers and enterprise customers the following principal services: mobile device and accessory wholesaling, supply chain management solutions for mobile device distribution and inventory management, mobile device insurance and buyback, retail solutions and financial services.

This document, which has been approved by the Brightstar EMEA leadership team ("leadership team"), details the approach of the Brightstar UK entities ("the Group") in dealing with tax risks, its attitude towards tax planning and its relationship with HMRC. It is effective for the period to 31 December 2017 and shall remain in effect until any amendments are authorised by the leadership team.

2. Approach to tax risk management

The key business objectives of the group are to:

- **strengthen the existing business;**
- **grow the business geographically, organically and via acquisitions; and**
- **extend the range of services offerings available.**

As part of the leadership team's review of projects to further these objectives, the tax risks, as applicable, are concurrently assessed. These tax risks are reviewed by the Tax Department, the UK and Global teams as appropriate, and if there is tax uncertainty advice may be taken from third parties to provide clarity and support the business decision making process.

In summary, the leadership team consider tax risk as an intrinsic part of the business review process.

3. Attitude to tax planning

The Group focuses primarily on tax compliance rather than tax planning, however, where appropriate tax planning to minimise cash tax payable may be undertaken. Such planning will be commercial and have economic substance but will not be artificial or deemed to be aggressive. The opportunity for further tax savings is balanced by, inter alia, the desire to have minimal open tax issues and to maintain an open and cooperative relationship with HMRC.

All Brightstar staff are obliged to act in accordance with the Brightstar Code of Ethics and Conduct (<https://www.brightstar.com/ethics-and-compliance/>).

4. Level of tax risks accepted

Brightstar is a large business with many opportunities that generate tax risks in the form of increased compliance requirements and occasionally uncertainty in the application of tax law. These tax risks are proactively evaluated and managed by the business managers, the Tax Department, external advisors as necessary and the leadership team in accordance with the Group's tax risk appetite and its Code of Conduct.

5. Working with HMRC

The Group purposefully adopts an open and cooperative relationship with HMRC and does not participate in aggressive tax avoidance schemes. It places significant value on the relationship with HMRC and consequently ensures that its tax returns are clear and transparent, it has regular meetings with HMRC regarding its affairs and where, after seeking external advice, there remains uncertainty in the application of tax law to its new business ventures/services offerings it proactively raises these with HMRC to agree the correct tax treatment.