

## **Mastek Group Tax Strategy**

Mastek Limited and its subsidiaries (“Mastek” or “Company”) are committed to comply with existing laws and regulations and have a policy of zero tolerance to non-compliance, which is an integral part of our culture and operating philosophy. This Policy sets out the steps that the Company is taking to ensure prevention of criminal facilitation of tax evasion by the Company and/or its subsidiaries referred to in Appendix “A”.

This Policy is applicable in all jurisdictions in which the Company operates, and it applies to all directors, employees, officers, workers, recruitment agencies, consultants, volunteers, business partners, vendors/ suppliers, service providers or any other persons who perform services to the Company, or for or on behalf of the Company directly or indirectly.

### **Mastek Group**

Mastek Limited is the ultimate holding company of Mastek Group. It is a publicly held enterprise engaged in provision of vertically- focused enterprise technology solutions. Mastek Group has 5000+ employees across the Globe and has its presence in 40+ countries. Mastek Group facilitates and develops digital solutions across industry verticals such as Healthcare and Life sciences, Retail, Manufacturing, Financial services, and Government/Public sector.

### **Group tax strategy:**

The group tax strategy is aligned to the Company’s corporate governance practice, value system and its enterprise risk management framework. Integrity and transparency are key to the corporate governance practices to ensure that we gain and retain the trust of all the stakeholders at all times.

The tax strategy charter comprises the following:

1. Tax Governance
2. Tax Compliance
3. Planning
4. Risk management and certainty
5. Engagement with tax authorities
6. Raising Concerns

### **1. Tax Governance**

Our focus on tax governance, an outcome of the ethically driven tax processes, has at its core the objective of sustaining the value that has been created. The Board’s, Audit and Risk Committee has oversight of identification, evaluation and mitigation of strategic, operational, legal and compliance risks. The Audit Committee of the Board is responsible for the review and approval of the Mastek Group Tax Strategy. The Chief Financial Officer (CFO) of the company is responsible for the implementation of the Mastek Group Tax Strategy. The CFO briefs the Audit committee and the Board on all the tax issues regularly.

The Company’s code of conduct also expresses our commitment to conducting business ethically. It explains what it means to act with integrity and transparency in everything we do and in accordance with our unique culture and values. If any person is in breach of this Policy, or is found to have facilitated tax evasion in the Company’s business, or in its supply chain, the Company will terminate the contract for services of such person with immediate effect and pursue legal remedies against the concerned person.

In addition, many countries have enacted anti-corruption legislations (e.g. Anti-Bribery and Corruption; Anti-Money Laundering, etc.) which impose liabilities on companies, which are involved in direct or indirect illegal

payments, including in order to facilitate tax evasion. Thus, the Company may incur criminal and civil liability, as well as reputational damage, where any person makes unlawful payments to facilitate tax evasion in the course of their work on behalf of the Company. This exposure can arise even where concerned person did not themselves authorize any such payment. It is therefore implied that all persons associated with the company take adequate steps to ensure that improper payments or advantages or arrangements are not offered or made, or solicited or received by themselves or on their behalf or on behalf of the Company.

## 2. Tax Compliance

Tax compliance is a priority in each and every jurisdiction where the company operates. Mastek seeks to comply with tax filing, tax reporting and tax payment obligations globally for all taxes. All transactions between Mastek Group companies are conducted on an arm's-length basis. External tax advisor support is sought on a need basis to comply with local country tax regulations. Global compliances are tracked through compliance tracker system which have inbuilt early warning mechanism. The summary report from the system and the dashboard is made available to Group Tax Head and to Group CFO and are monitored at regular intervals.

The day-to-day compliance is handled by the core tax team which identifies, evaluates, monitors and implements tax laws, manages tax risks. They work towards ensuring uniformity in tax processes and compliance with our legal obligations. It is entrusted with responsibility of integration and automation while exploring opportunities for legitimate value creation.

## 3. Tax planning

Mastek recognizes that it has a responsibility to pay appropriate tax in each of the jurisdictions in which it operates. Mastek may avail tax incentives which are made available by the laws and regulations of a jurisdiction provided they are aligned with its business or operational objectives. The company endeavours to operate in an efficient and legally compliant manner and may seek external advice in relation to tax matters or areas of complexity or uncertainty to support Mastek in complying with its tax strategy. As a policy, the Company does not undertake aggressive tax planning, does not tolerate tax evasion, nor does it tolerate the facilitation of tax evasion by any person(s) acting on the behalf of the company. Mastek does not undertake tax planning that is artificial or without any substance; nor does it transfer any created value to jurisdictions with a lower tax burden, nor does it use any favourable jurisdictions or so-called "tax havens" for tax avoidance, it is, in fact, driven by a commercial rationale.

## 4. Tax risk management and certainty

As a large multi-national organization, Mastek is exposed to a variety of tax risks and has a low tolerance to tax risk. The tax law may be subject to risk of interpretation especially where there is less clarity on taxation of new business models due to continuous evolving technology. The Core Tax team takes the lead role in identifying, managing and monitoring tax risks within the business with regular review.

Where there is significant uncertainty or complexity in relation to a risk, external advice is sought to get certainty. In certain cases, the company may also approach the tax authorities to disclose and resolve issues, risks and uncertain tax positions by obtaining tax rulings, Advance pricing agreements (Unilateral, Bilateral or Multilateral) depending upon the complexity of the issues etc.

The Risk Management Strategy regularly followed is as under:

- Monitor changes to tax legislation in all jurisdictions which directly / indirectly impacts the company
- Implement effective controls and governance for preventing non-compliance
- Seeks professional advice wherever necessary including tax authorities.

## 5. Engagement with tax authorities

Mastek approaches tax authorities with honesty, integrity, fairness and in a spirit of compliance. Company is fully committed to prompt disclosure and transparency in all tax matters with all the tax authorities (Direct, Indirect, Municipal, Federal, State or by whatever name called). From time to time, our views (or those of our advisors) on the appropriate tax treatment in any given case may differ from those of the tax authorities. Where such circumstances arise, we are prepared to litigate where we disagree with a ruling or decision of a tax authority but will first seek to resolve any disputed matters through pro-active and transparent discussion and negotiation. Mastek strive to work with fullest cooperation with local tax authorities and comply with local standards on tax accounting and disclosures.

## 6. Raising Concerns

If at any time, anyone is concerned or believes that a particular transaction or activity may amount to criminal facilitation of tax evasion or a breach of this Policy, he/she should immediately report to Group Legal Head or Group CFO.

All matters raised will be dealt with in strictest confidence and the reporting person will not suffer any adverse treatment as a result of reporting any genuine concern, raised in good faith, under this Policy. This applies, even if after investigation, he/she is found to be mistaken. If any reporting person believes that he / she has suffered adverse treatment, they should immediately inform the appropriate authority through the Grievance reporting process.

### Appendix “A”

Group entities	Abbreviation	Legal Status	Registered Address
Mastek Limited	Mastek India	Company	804/805, President House, Near Ambawadi Circle, Ahmedabad – 380 006, Gujarat, India
Mastek Enterprise Solutions Private Limited (earlier known as Trans American Information Systems Private Limited)	MESPL	Company	804/805, President House, Near Ambawadi Circle, Ahmedabad – 380 006, Gujarat, India
Mastek (UK) Limited	MUK	Company	100 Brook Drive, Green Park, Reading, RG2 6UJ
Mastek Systems Company Limited	Evolutionary UK	Company	Harrow Business Centre, 429-433 Pinner Road, North Harrow, Middlesex HA1 4HN, UK
Mastek Inc.	Mastek Inc.	Company	15601, Dallas Parkway, Suite 250, Addison, TX, 75001, USA
Trans American Information Systems Inc.	TAISTech US	Company	15601 Dallas Parkway, Suite 250, Addison, TX 75001, USA
Newbury Cloud Inc.	Newbury Cloud Inc.	Company	400,Trade Center, Woburn, MA 01801, Massachusetts, USA
Evolutionary Systems Corp.	Evolutionary Chicago	Company	400,Trade Center, Woburn, MA 01801, Massachusetts, USA
Mastek Digital Inc.	Mastek Digital Inc.	Company	4 Robert Speck Parkway, 15th floor, Mississauga, Ontario L4Z1S1, Canada
Evolutionary Systems Canada Limited	Evosys Canada	Company	11 Balin Cres.Brampton ON L6X 0V5, Canada
Mastek Systems Pty Ltd	Evosys Australia	Company	Level 26, 44 Market Street Sydney, NSW 2000, Australia
Evolutionary Systems Consultancy LLC	Evosys Dubai	Company	PO Box 7891, Air Port Road, Abu Dhabi, UAE
Mastek Arabia FZ LLC	Mastek Dubai	Company	112, Building 11, Dubai Internet City, PO Box: 500830, Dubai, UAE
Evolutionary Systems Qatar WLL	Evolutionary Qatar	Company	1028 Al Shoumoukh Towers, 10th floor, Tower B, C –Ring Road, Al Sadd, Doha,PO Box 122001, Qatar

Group entities	Abbreviation	Legal Status	Registered Address
Evolutionary Systems Saudi LLC	Evolutionary Saudi Arabia	Company	Suite #1, Addayel Plaza, Dabbab Street, Sulaimaniah, PO Box: 220032, Riyadh - 11311, Kingdom of Saudi Arabia
Mastek Systems Bahrain WLL	Evosys Bahrain	Company	Manama, Hooraa, Block No 319, Road 1910, Building 322, Flat no 69, Darr Elizz Tower, P.O Box 548, Bahrain
Mastek Arabia Systems Egypt LLC	Evosys Egypt	Company	37 Ali Amer Street - Off Makram Ebeed Street - Infront of Child Garden, 6th floor, Flat 603, Nasr City - Cairo, PO Box 4451021, Egypt
Evosys Kuwait WLL	Evosys Kuwait	Company	Al-Wataniya Tower, 7th Floor, Al-Qibla, PO Box 28702, Kuwait
Mastek Systems (Malaysia) Sdn Bhd	Evosys Malaysia	Company	Suite B-01096, Dataran 3 Two, No. 2, Jalan 19/1, Petaling Jaya - 46500, Selangor, Malaysia
Mastek Systems BV	Evolutionary Netherlands	Company	Haarlemmerweg 331, Amsterdam 1951LH, Netherlands
Mastek Systems (Singapore) Pte. Ltd.	Evolutionary Singapore	Company	Level 42-01, Suntec Tower Three 8 Temasek Boulevard - 038988, Singapore
Evolutionary Systems BV – Romania Branch	Evosys Romania	Branch office	22 Tudor Vladimirescu Blvd., Sector 5, Bucharest – 050 883, Romania