

## **Palantir Technologies UK, Ltd. (“PTUK” or the “Company”) Tax Strategy**

The purpose of this page is to outline the approach adopted by PTUK in managing its tax obligations and activities. In making this tax strategy available, PTUK is fulfilling its responsibilities under paragraph 19(2) of Schedule 19 of the Finance Act 2016 enacted by the Parliament of the United Kingdom (“UK”).

This tax strategy applies to all UK taxes (as defined under paragraph 15(1) of Schedule 19 of the Finance Act 2016) applicable to PTUK from the date of publication until it is superseded. This tax strategy has been published in respect of the financial year ending December 31, 2020. It will be reviewed annually and updated as appropriate for legislative developments in the UK.

### **Approach to Risk Management**

PTUK believes that it operates effective tax governance – understanding the tax risks and ensuring that senior personnel and outside advisors with appropriate skill and experience are involved in key tax decisions. Ultimate responsibility for PTUK’s tax risk management and compliance rests with the Chief Financial Officer of Palantir Technologies Inc. with oversight of the Board of Directors of Palantir Technologies Inc.

The Company believes that it maintains strong tax-related internal controls through its ultimate parent company, Palantir Technologies Inc. These controls are reviewed on a regular basis to ensure that the controls are in place and risks are adequately managed.

The Company is committed to using external tax advisors to provide guidance necessary to assess tax risks and to ensure its compliance with applicable tax laws and regulations.

### **Attitude Toward Tax Planning**

PTUK aims to comply with applicable tax obligations and laws in all jurisdictions applicable to PTUK and to act in a way which upholds its reputation as a responsible corporate body.

PTUK does not and will not engage in artificial transactions with the sole purpose of reducing or avoiding UK tax. The Company will consider undertaking a transaction in a way that gives rise to UK tax efficiencies provided that it also aligns to the Company’s commercial objectives and complies with the relevant UK legislation.

PTUK does not and will not engage in tax efficiencies if the underlying commercial objectives do not support the position, or if the arrangements impact the Company’s reputation, brand, corporate and social responsibilities or future working relationships with HM Revenue and Customs (“HMRC”).

All intra-group transactions are conducted on an arm’s length basis and in accordance with the other guidelines laid down by the Organization for Economic Co-operation and Development and in line with other domestic legislation and documentation requirements.

### **Level of Acceptable Risk in Relation to UK Taxation**

PTUK is not prescriptive about the level of tax risk which is acceptable for its business but is committed to paying the right amount of tax at the correct time. PTUK seeks to be efficient in its tax affairs based on sound commercial principles and in accordance with relevant tax legislation. All material tax positions are appropriately reviewed and documented by the Company. The Company believes that it does not pursue aggressive tax planning arrangements.

### **Approach Toward Relationship with HMRC**

PTUK believes that it maintains an open and positive relationship with HMRC. It is the Company’s policy to be transparent and proactive in all interactions with HMRC. PTUK is committed to making fair, accurate and timely disclosure in its tax returns and to responding to inquiries raised by HMRC in a professional and timely matter.

When making submissions to HMRC, PTUK always makes reasonable attempts to disclose all relevant facts and identify any areas where it considers there is potential for the tax treatment to be uncertain. Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they have been identified.

**Palantir legal entities in the UK**

This tax strategy applies to all PTUK companies.

- Palantir Technologies UK, Ltd.
- Palantir Technologies UK – Eagle, Ltd.

Publication Date: December 31, 2020