

BMC UK Group Tax Strategy for the year ended March 31, 2019 - Published March 31st, 2019

The publication of this document is regarded as satisfying the statutory obligation under Paragraph 16(2), Schedule 19, Finance Act 2016. This document applies to all BMC entities organized in the UK (collectively the “BMC UK Group”).

BMC is a global leader in innovative software solutions that enable businesses to transform into digital enterprises for the ultimate competitive advantage. Our Digital Enterprise Management solutions are designed to make digital business fast, seamless, and optimized from mainframe to mobile to cloud and beyond. BMC digital IT transforms 92 percent of the Forbes Global 100 and serves more than 10,000 customers worldwide.

Approach to tax risk management and governance arrangements

BMC is committed to complying with the tax laws in all territories in which we operate, including the UK, which is the main place of business for the BMC UK Group. For BMC, maintaining compliance means, among other things, reporting and paying the amount of tax that is legally due and disclosing all relevant facts and circumstances to tax authorities.

BMC’s Code of Conduct (<https://www.bmc.com/legal/code-of-conduct.html>) sets out guidance about business behavior expected of the BMC community and our approach to tax aligns with the Code of Conduct.

BMC’s VP – Global Tax, reporting to the Chief Financial Officer, is responsible for BMC’s overall tax strategy. Day-to-day tax matters of the BMC UK Group are assigned to BMC’s EMEA Tax Director and a team of qualified in-house tax and accounting professionals.

BMC maintains suitable systems and internal control processes to ensure BMC’s overall control framework is appropriate. BMC’s Board of Directors through its Audit Committee oversees the integrity of BMC’s financial reporting system, internal controls over financial reporting and disclosure, compliance, governance and risk management framework including the elements related to taxation.

Attitude toward tax planning

In structuring BMC’s commercial activities, we will consider – among other factors – the tax laws of the countries within which we operate with a view to maximizing value on a sustainable basis for our shareholders. Tax planning undertaken will have commercial substance and will not have a sole purpose of obtaining a tax advantage. BMC seeks to minimize uncertainty, risk or disputes and engages external tax advisors as appropriate. BMC conducts transactions between BMC group companies on an arm’s length basis.

Approach to tax risk

Given the scale of our business and volume of tax obligations, risks will inevitably arise in relation to the interpretation of tax laws and the nature of our compliance arrangements. The BMC UK Group does not have rigid levels of acceptable tax risk but proactively seeks to identify, evaluate, manage and monitor tax risks to ensure they remain in line with BMC's risk appetite. Where there is significant uncertainty or complexity in relation to a risk, external advice may be sought. BMC manages tax risk on a real-time basis seeking advance assurance where possible.

Approach to dealing with tax authorities

BMC operates with integrity with our compliance and reporting and engages with tax authorities, including HM Revenue & Customs, with honesty, integrity, transparency, respect and fairness with a cooperative mindset. If it is unclear how a tax law should be applied, BMC may engage tax authorities in advance of undertaking transactions to confirm the correct application of such tax law. BMC may litigate where we disagree with a ruling or decision of a tax authority.