

Global Tax Policy Statement

ICON Plc

This statement applies to ICON plc and its subsidiary companies (referred to hereinafter as “ICON” or “the Group”). This document sets out ICON’s approach to tax and will be reviewed periodically as necessary.

Introduction

At ICON, we are committed to our core values of Accountability & Delivery, Collaboration, Partnership and Integrity in everything we do. Meeting these values requires us all to work to the highest ethical standards and demonstrate a commitment to honesty, transparency and quality. In order to consistently maintain our core values ICON employees are committed to abiding by all applicable laws, standards, rules and regulations, when carrying out our duties on behalf of ICON.

Our Global Code of Ethical Conduct addresses the core principles underpinning the behaviour required of each of each ICON employee globally in internal interactions with each other and our external dealings with patients, clients, health care professionals, regulators, investors, vendors, tax authorities and other third parties.

Founded and headquartered in Ireland and employing over 14,400 employees throughout our operations across 98 locations in 40 countries, we pay a significant amount of tax worldwide, including corporate income tax, stamp duty, employment tax and other taxes. In addition, we collect and remit employment and social security taxes, as well as indirect taxes, such as VAT and excise taxes. We pay and collect tax in accordance with the relevant laws and regulations in the territories in which we operate and are committed to complying with relevant tax laws in a responsible manner on a global basis.

Governance & Risk Management

The Group’s risk management and internal control systems are overseen by the Board of Directors. Management has set and the Board has approved the culture and values of the organisation, which supports the overall risk management framework.

The Audit Committee is responsible for reviewing and assessing the adequacy and effectiveness of the internal controls in place over financial reporting. The specific internal controls over taxation are designed and operated by the VP of Tax. These controls are reviewed and tested periodically by the Group’s Internal Audit function and the independent external auditors, the results of which are reported to the Audit Committee.

Responsibility for the Group’s overall tax strategy sits with the Group CFO and is overseen by the Board. The VP of Tax, who reports directly to the Group CFO, is responsible for the implementation of the tax strategy on a day-to-day basis. The VP of Tax leads a team of tax professionals, located in Ireland and the US, with the relevant qualifications, training and understanding of the group’s operations to effectively monitor and manage the Group’s tax position.

The ICON tax team, led by the VP of Tax, seeks to identify and manage tax risks on an ongoing basis. Where there is significant uncertainty or complexity in relation to a transaction or risk, the Group obtains necessary input from third party advisors as appropriate.

The global nature of the Group means that it operates across a large number of jurisdictions and is subject to periodic audits and reviews by local tax authorities on a range of tax matters. The application of tax legislation to any particular set of circumstances may not always be clear cut and positions adopted by the Group may be subject to challenge by tax authorities during such audits or review. ICON understands that tax law is open to different interpretations and the tax treatment of many items can be uncertain. Amounts accrued in respect of such uncertainties are determined based on management’s interpretation of the relevant tax laws and the likelihood of expected outcomes.

Tax compliance

ICON is committed to observing all applicable laws, rules and regulations in meeting our tax compliance, reporting and payment obligations across all tax heads. These responsibilities are managed on a jurisdictional basis with appropriate internal and external resources with global oversight from the tax and finance teams in ICON Ireland.

The finance teams with responsibility for ongoing tax compliance deliverables in each jurisdiction work in collaboration with the ICON tax team and with third party advisors as appropriate in order to ensure we meet the group's compliance obligations in an accurate and timely manner.

Responsible Tax Management

Tax incentives and reliefs are operated by governments in many countries in order to support investment and encourage economic development. ICON seeks to avail of such reliefs in the manner intended, where it is appropriate to do so, based on the Group's operations in such jurisdictions. ICON does not invest in artificial tax schemes or arrangements.

ICON engages in operationally aligned tax management that supports our business and reflects our economic activities in each of the countries in which the Group operates.

The Group's transfer pricing policies are guided by international standards and are regularly reviewed by members of the ICON tax team, including the Director of Transfer Pricing, by our external independent auditors, other leading advisory firms and local specialists in the jurisdictions in which the Group operates. The Group recognises the importance of ensuring alignment of our tax strategy with the commercial substance of our business operations, and our transfer pricing policies reflect this.

ICON support the work of the OECD on BEPS. The group has actively engaged in this process, providing constructive input and feedback on the application of BEPS proposals to the CRO Industry. ICON complies with the requirements for Country-by-Country reporting.

Relationships with Tax Authorities

At the core of ICON's values is to build and develop collaborative relationships. ICON aims to maintain transparent and cooperative relationships with the tax authorities in each territory in which the Group operates.

ICON will not take an artificial tax position. However we recognise that in a complex world there may be scope for alternative views or interpretations where perspectives or the availability of information differ.

Where any such difference in views occurs, the Group will seek to engage with tax authorities to resolve any such disputes in a collaborative manner as efficiently as possible. To date this approach has served the group well. The group has been subject to audit or review at some point by tax authorities in almost all jurisdictions it operates without any material net tax liability having been assessed on the company as a result of such audit and review activity.

While the past cannot be regarded as any indication of the result of any future audit or reviews, management believe this track record is both supportive of our approach to working with tax authorities and indicative of the appropriateness of the group's tax compliance policies and activities generally.

ICON plc considers this publication as complying with the requirements of Part 2 of Schedule 19 of the UK Finance Act 2016.

