

UK Tax Strategy

Period Ended 30 June 2021

PRA Health Sciences, Inc. (“PRA”) and its subsidiaries have published this UK Tax Strategy (the “Strategy”) to document those parts of PRA’s tax strategy which are relevant to UK taxes. Publication of this Strategy will fulfil the duty of Pharm Research Associates (UK) Limited and other affected subsidiaries of PRA incorporated in the United Kingdom under paragraphs 19(2) and 22(2) of Schedule 19 of the Finance Act 2016.

1.0 Purpose

This statement sets out the UK Tax Strategy which was effective in the period 1 January 2021 to 30 June 2021 for PRA Health Sciences, Inc. Group UK Subsidiaries (defined in section 2.0 below).

On 1 July 2021 PRA Health Sciences, Inc. was acquired by ICON plc. From 1 July 2021 PRA Health Sciences, Inc and its subsidiaries have operated under the Global Tax Policy of ICON plc. The Global Tax Policy Statement is published on the ICON plc website. ICON plc consider this publication complies with the requirements of Part 2 of Schedule 19 of the UK Finance Act 2016.

2.0 To Whom Does This Strategy Apply?

This Strategy applies to all 51% subsidiaries of PRA Health Sciences, Inc. which are (or are treated as if they are) formed and registered under the Companies Act 2006. These subsidiaries are named at part 4 of this Strategy and are collectively referred to as “PRA UK”.

3.0 Procedures

This Strategy sets out PRA UK’s approach to handling UK tax compliance and managing UK tax risk for the period ended 30 June 2021. It has been subject to review and approval by the Board of each entity constituting PRA UK, and the Senior Accounting Officer.

3.1 Framework for the Management of Tax Risk and Compliance

PRA UK is a part of a Multinational Enterprise Group (referred to herein as “PRA Group”) headed by PRA as the Ultimate Parent Entity. PRA is listed on NASDAQ, (as “PRAH”) and subject to oversight by the U.S. Securities and Exchange Commission. PRA UK is a material part of the PRA Group and as a result various processes and procedures of PRA UK are subject to control under the Sarbanes-Oxley Act (“SOX”). PRA UK itself is subject to Senior Accounting Officer (“SAO”) legislation in the UK. These factors shape the environment under which tax risk is managed by PRA UK.

Within PRA Group, responsibility for tax strategy and management of tax risk ultimately sits with PRA’s Chief Financial Officer. Day-to-day responsibility is assigned to PRA’s Senior Director of Global Tax. In the UK, oversight of these areas is assigned to the VP Finance & Accounting EAPA, who is also the SAO for PRA UK. The SAO is responsible for interpreting and implementation of tax strategy for PRA UK. The SAO is supported in the interpretation and implementation of the tax strategy by the Senior Tax Manager EAPA and through engagement with suitably qualified external advisors whenever necessary.

3.2 Use of Tax Planning

PRA is committed to the highest standards of ethical business conduct and to the practice of business in accordance with all applicable laws, rules and regulations, as defined in the PRA Code of Conduct. All employees in the PRA Group, (including directors and officers), are required to adhere to the PRA Code of Conduct. Guided by the PRA Code of Conduct, the following standards of PRA apply equally to PRA UK:

- It is the policy of PRA that any tax positions taken would be consistent with the Code of Conduct.
- PRA will utilise appropriate tax incentives or opportunities for obtaining tax efficiencies where these are aligned with the intended policy objectives behind the incentives, and aligned with our business and/or operational activities.
- Any business structuring that is undertaken will have commercial and economic substance, PRA does not seek to take an aggressive interpretation of tax legislation or use tax avoidance schemes which are contrived or artificial.
- Assessments of tax risk should be undertaken before entering into any significant new initiatives. This may include, as appropriate, obtaining external professional advice and opinion.

3.3 Tax Risks

Given the scale and the cross-border nature of the operations of PRA Group and PRA UK, the business is inevitably exposed to a level of tax risk. The main potential sources of risks are considered to be:

- Compliance failure, such as submission of late or inaccurate returns, the failure to submit claims and elections on time or where finance or operational systems and processes are not sufficiently robust to support tax compliance and reporting requirements.
- Changes to business structure, if undertaken without appropriate consideration of the potential tax consequences or where advice taken is not correctly implemented.
- Potential for double taxation, to the extent that business activities may be relevant to more than one taxing authority, the same income may be effectively taxed twice, (in two different jurisdictions).

Sources of potential risk are identified and monitored internally on a transactional basis, as and when they arise. PRA UK aims to have controls and procedures in place so that its tax liabilities are calculated, filed and paid accurately in all material aspects. In this way, identified tax risks are minimised. Where significant uncertainty or complexity exists, PRA UK will seek suitable external advice in order to adopt a filing position which, based on the information available at the time, PRA UK considers as more likely than not sustainable under challenge.

3.4 Working with HMRC

PRA UK’s relationship with HMRC is focused around timely tax compliance, pro-active disclosure of any errors identified in UK tax filings and the considered use of advanced clearance procedures in relation to unusual or higher risk transactions, such as business restructuring.

Generally, PRA UK will engage directly with HMRC. When PRA UK employs the services of professional tax advisers they may, in some circumstances, liaise with HMRC on our behalf. The objective of PRA UK is always to ensure that the best route is taken to provide HMRC all of the relevant facts to positively resolve any tax issues and to reduce tax risk.

4.0 Approval

This Strategy is approved, on behalf of the constituent members of PRA UK, as follows:	
Company:	Pharm Research Associates (UK) Limited IMP Logistics UK Limited Sterling Synergy Systems Limited

