

GE UK Tax Strategy

With operations in the UK since the 1930s, GE has been an engine of progress and economic growth in the UK and today all of our GE businesses have operations in the UK. We invest in jobs and innovate to build hardware and software solutions that meet real-world challenges. We have built up our presence in the UK through a combination of acquisitions and investment in our existing businesses in the UK.

The tax strategy below is a group wide strategy for GE in the UK.

GE's approach to risk management and governance arrangements in relation to UK taxation

As a part of doing business, we pay what we owe in every country where we operate, including the UK. GE is a large international group, which identifies and manages diverse risks inherent in its size, complexity, the different countries in which it operates, and the customers and suppliers with whom it engages. These risks include UK tax risk and uncertainty.

GE employs tax professionals and engages a firm of UK tax professionals who together support GE's businesses by aligning the tax strategy with the strategy and operations of each business. Many of these tax professionals are dedicated to specific business lines or cover particular geographical areas. In this, tax operates in the same way as the legal, finance and controllership functions, all of which dedicate staff and resource so as to be able to assess and manage risk and compliance in conjunction with global GE tax and finance functions. Accordingly, taxes are monitored and considered by business management as part of their wider review and approvals processes.

Alongside these processes, GE requires as a matter of corporate policy that all appropriate corporate governance requirements of individual corporate entities within the group are complied with. GE, its directors, and its employees, work to ensure these requirements are met. In particular, directors considering whether to give approval to transactions will take into account their legal duties as directors of the applicable corporate entity.

GE's attitude towards tax planning

A guiding principle to our tax mission is to protect GE's reputation by complying fully with tax laws around the world and with the highest integrity. The mission of GE's tax team is to support GE's global competitiveness by minimising worldwide tax cost and risk while complying fully with tax laws.

GE believes that it interprets UK tax law in a reasonable way. GE does not engage in UK tax planning that is not aligned with business strategy and operations, and its interpretation of UK tax law therefore reflects that commercial background and takes into account what we see as the purpose and intent of the law. Where they are available and appropriate to the business, GE seeks to apply UK tax incentives and exemptions in the manner intended, taking external professional advice where necessary.

Where material uncertainty exists in any area of its business, GE seeks external advice to ensure that it is fully compliant with applicable laws. GE tax professionals, whether employees of the company or engaged through a professional services firm adopt the same approach in their management and mitigation of risk and uncertainty.

Level of risk in relation to UK taxation that GE is prepared to accept

GE engages a firm that employs UK tax professionals to ensure that risks are fully assessed, and, where uncertainty exists seeks additional external advice, to ensure all tax positions taken are reasonable

under the law. In doing so, tax risk is assessed on a case by case basis based on the relevant facts and circumstances.

GE's approach towards its dealings with HMRC

GE is cooperative and transparent in its interaction with HMRC and provides all relevant information that is required to review tax risks. GE is committed to working collaboratively, and wherever possible in real time with HMRC to achieve swift agreement on tax risks. This includes through advance agreements and clearances where appropriate, discussion prior to returns submission on a proposed interpretation of tax law where the law is unclear and/or new and in relation to any disputed issues.