

Travelport tax strategy statement

Version 3.1 December 2019

1. Introduction

This policy statement addresses the Travelport Group's (the "Group") strategy in relation to its global tax affairs and relations with taxing authorities for the year ended 31 December 2019. The Travelport Group is comprised of Toro Travelport Limited ("TTL") and its controlled subsidiaries, including all UK entities within the Group, and is fully owned by Siris Capital Group and Evergreen Coast Capital as of 30 May 2019. Whilst this statement meets the Group's obligations to publish its tax strategy under legislation in the United Kingdom ("UK"), where its principal executive offices and one of its principal operating companies are located, the policies expressed in this statement apply to the Group's global operations wherever located.

2. Key principles

The Group's overall approach to taxation is to preserve value and manage risk in the context of the Group's corporate and business objectives, whilst ensuring compliance with all relevant laws and regulations.

The Group believes that its obligation is to pay all taxes legally due in any territory in which it has a taxable presence, in accordance with the rules set by the relevant tax authorities.

3. Tax risk management and governance

Given the scale of the Group's business and international footprint, it will inevitably be subject to risks arising from compliance arrangements and interpretation of complex tax laws. Tax risks will be reviewed, monitored and managed in line with the wider objectives of the Group.

The Head of Tax has responsibility for the tax affairs of the Group, with day to day management of tax affairs being handled by the Group's UK and US tax departments.

The Group's external tax reporting will comply with US GAAP, the Group's own accounting policies and relevant local GAAP where required. Compliance obligations for the taxes are managed through a combination of the Group's tax department, the Group's payroll department and external tax advisors with oversight from the relevant in-house department where applicable.

The Group falls within the UK Senior Accounting Officer ("SAO") regime. SAO imposes an obligation on our Chief Accounting Officer ("CAO") to take personal responsibility for ensuring that controls over UK tax compliance risks are effective and to certify annually as to their status. The Group supports the CAO to fulfill the relevant duties under the regime.

Major tax issues and exposures identified in the Group are subject to regular reporting to the Group's Audit Committee.

This tax policy is aligned to the [Travelport Code of Business Conduct and Ethics Policy and Code Guidance](#) and approved by the Board of Directors of TTL.

4. Attitudes to tax planning

All tax planning and tax related activities undertaken by the Group will be conducted in accordance with the wider principals set out in [Travelport Code of Business Conduct and Ethics Policy and Code Guidance](#).

The Group does not undertake tax planning that is contrived or artificial, but will seek to maximize benefits from regimes, reliefs and incentives intended to promote investment and innovation and foster an attractive commercial environment.

As an international business operating across borders in multiple jurisdictions, the Group pays due consideration to relevant guidance set by the Organisation for Economic Co-operation and Development (“OECD”) around transfer pricing principles and will at all times seek to comply with applicable internationally accepted arms-length standards.

5. External advisors

The Group uses external advisors in a variety of circumstances to

- Validate and support uncertain tax positions;
- Explore alternative tax structure options and planning opportunities;
- Provide tax compliance services; and
- Provide support in disputes with tax authorities around the world.

All decisions and positions in respect of tax are the responsibility of the Head of Tax and, consequently, the choice of external advisors on all material matters for the Group are subject to Tax Department review and approval by the Head of Tax.

6. Engagement with tax authorities

All dealings with tax authorities or other relevant bodies will be conducted in good faith, with openness and transparency, and the Group will ensure that any external advisors acting on its behalf follow the same principles.

Given the significance of the UK operations in the Group, the Group also will actively engage with HM Revenue & Customs to assess risk, discuss business developments and seek clarity on the interpretation of complex UK tax laws.

More generally, whilst the Group does not take positions on tax matters that are unsupported by appropriate professional advice and that may create reputational risk or jeopardize its good standing with taxing authorities, the Group is prepared to litigate where it disagrees with a ruling or decision of a taxing authority, having always first sought to resolve matters through transparent engagement and discussion.

Publication and effective date

This policy is published by Travelport International Operations Limited on behalf of the Travelport Group companies and for the UK companies in the Group, in compliance with the duty under para 16(2) Schedule 19 Finance Act 2016. Travelport International Operations Limited is a UK limited liability company with its principal place of business located at One Axis Park, 10 Hurricane Way, Langley, Berkshire, SL3 8AG, United Kingdom.

Effective Date: December 2019