



Pure Storage UK Limited Tax Strategy

Pure Storage UK Limited is publishing this tax strategy in compliance with the requirements of the UK Finance Act 2016 Schedule 19, paragraph 19(2).

Overview

Pure Storage, Inc. (“the company”) is a multinational company headquartered in Mountain View, California. Pure develops, manufactures, and markets data storage solutions to commercial and enterprise customers across multiple industries and has operations throughout the world. The company pioneers in the all-flash array technology which replaces the traditional storage systems designed for mechanical disk.

Pure Storage UK Limited is a 100% owned subsidiary of Pure Storage, Inc. Pure Storage UK is engaged in the provision of sales and marketing services for Pure Storage, Inc. in its local market.

Approach to Risk Management

The Chief Financial Officer and the Vice President of Global Tax & Trade are based in Mountain View, California and are ultimately responsible for the UK’s overall tax strategy and policies. The CFO and VP will update the Audit Committee on material tax matters and operational risks. The day-to-day tax compliance and financial reporting obligations for the company are handled by the global tax and finance teams for all jurisdictions. In conjunction with external advisers, the teams monitor the wider tax environment for business developments and legislative changes that could impact the group’s tax position.

Attitude Towards Tax Planning and Tax Restructuring

The company engages in tax planning that is aligned with its business activities or supply chain needs. Its approach to tax planning is to remain compliant with local tax laws and minimize tax risks. The company may make certain elections, or claim incentives or reliefs, where available and legally permissible. Intercompany transactions are conducted at arms-length in accordance with the Organization for Economic Cooperation and Development (OECD) principles on transfer pricing guidelines. The company engages a third-party firm to assist in the documentation of and validation of arm’s length pricing, as well as assistance with any required Country-by-Country Reporting.

Level of Risk in Relation to UK Taxation That It Is Prepared to Accept

The level of risk which the company accepts is with the objective to achieve transparency and certainty. The company is committed to full compliance with all applicable UK laws and regulations. For transactions which are deemed to have a material level of uncertainty or complexity, the company will seek external advice to help identify, evaluate, and manage these transactions in order to mitigate the risks. The company will consult directly with HMRC if, after consulting with external advisors, there is still uncertainty on the interpretation of the tax legislation.

Approach Towards Its Dealings with HMRC

The company seeks an open, transparent, and collaborative relationship with HMRC. Where queries are raised by HMRC, the company will promptly respond and is committed to a full disclosure of all the relevant facts and circumstances. Any inadvertent errors in the submissions made to HMRC will be fully disclosed as soon as it is reasonably practical. The company will resolve issues with HMRC in a timely manner and where disagreements arise, will work with HMRC to resolve issues by agreement.