

Stryker UK Tax Strategy

Introduction

Stryker is one of the world's leading medical device companies. Stryker is a US multi-national and is in over 100 countries around the world, including the UK group comprising sister entities. We are guided by a unifying mission: Together with our customers, we are driven to make healthcare better, and our charter values are: Integrity, Accountability, People and Performance.

Stryker's Code of Conduct sets out what is expected and our approach to tax aligns with that. The Stryker UK entities' tax strategy is to comply with all applicable tax regulations and related disclosure requirements. Our UK tax strategy supports the Group strategy and its charter values.

Our commitment is underpinned by the following principles:

➤ **Relationship with government**

The Stryker UK entities are committed to build a strong and constructive relationship with HMRC through an open dialogue on issues of significance and to disclose relevant information to HMRC.

➤ **Attitude towards tax planning**

The Stryker UK entities engage in operational tax planning to support the business and reflects economic and commercial activity.

We adhere to relevant tax law and we seek to minimize the risk of uncertainty or disputes. We conduct transactions between group companies on an arm's-length basis and in accordance with current OECD principles.

➤ **Tax risk management**

The Stryker UK entities manage and controls its tax risks in a proactive manner. The global tax team operates in partnership with the UK business to identify, mitigate tax risks and seek appropriate advice from relevant professional firms. The group stay aware of changes in tax law as they affect the UK by getting support from in house tax expertise and/or third-party advisors.

➤ **Governance**

The UK tax strategy plus any potential risks are reviewed regularly by the board. The operation of the strategy is managed by the Senior Accounting Officer for each entity, the global tax department, internal audit and our external advisors.

➤ **Further information**

Stryker regards this publication as complying with our duty under paragraph 22 (2) of Schedule 19 UK Finance Act 2016. This publication applies to the following legal entities: Stryker UK Limited, Stanmore Implants Worldwide Limited, ITAPCo Limited, Imorphics Limited, HeartSine Technologies Limited, Physio-Control UK Sales Limited, Entellus Medical Europe Limited and Vexim UK Ltd for the financial year ending 31 December 2019. We will review and update annually.