



## LumiraDx Group - UK Tax Strategy

### Introduction

LumiraDx are a next-generation point of care diagnostic business addressing the current limitations of legacy systems by bringing lab-comparable performance to the point of care in minutes, on a single Instrument with a low cost of ownership.

Our vision is to provide enabling technologies to achieve better outcomes, improve the experience and results for patients and their care teams and reduce costs. We believe that:

- patient health outcomes need to and will be improved;
- better outcomes can be achieved while lowering costs;
- the convergences of multiple technologies will be instrumental to achieve these objectives;
- innovators and organisations that challenge the status quo will lead the way to improvements.

We are focused on transforming community-based healthcare by providing critical diagnostic information to healthcare providers at the point of need, thereby enabling more informed medical decisions to improve health outcomes while lowering costs.

In accordance with the requirements of paragraph 19(2) of Schedule 19 of the Finance Act 2016, LumiraDx Group Limited together with its UK subsidiaries (together referred to 'LumiraDx Group') are publishing their UK Tax Strategy for the financial year ended 31 December 2022.

This strategy applies to all UK subsidiaries and all taxes they are subject to such as corporate income taxes, stamp duties, value added taxes, employment taxes. This strategy sets out our approach to UK taxation and has been approved by the Board of Directors.

### Tax governance and management of tax risk

LumiraDx Group is ultimately listed in the USA on the NASDAQ. In line with its listed nature importance is placed on maintaining sound corporate governance practices such as having in place Corporate Code of Conduct, Corporate Governance Guidelines and Audit Committee. One of the key corporate principles as set out in LumiraDx Code of Conduct is compliance with laws, rules and regulations. Our approach is conservative and sets high minimum standards requiring highest levels of legal and ethical standards.

LumiraDX Group is committed to establishing and maintaining:

- strong tax compliance and tax administration practices including accurate and timely filing of returns and payment of taxes;
- appropriate internal tax controls and processes to support the finance and tax function in its oversight and support of business operations; and
- collaborative and open relationships with Her Majesty's Revenue & Customs (HMRC).

The Board has ultimate responsibility for oversight of business operations and the management's role in identifying and managing tax risks. We have a process in place for identifying, evaluating and mitigating tax risks as well as appropriate escalation to the executive management, including the Board and/or Audit Committee.

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<sup>1</sup> UK subsidiaries include: LumiraDx Group Limited, LumiraDx Limited; LumiraDx Care Solutions UK Ltd; LumiraDx Investment Limited; LKM Innovations Limited; LumiraDx UK Ltd; LumiraDx International Limited; LumiraDx Brazil Holdings Limited; LumiraDx Colombia Holdings Ltd; and Suresensors Limited.

The day to day business operations in the UK are supported by experienced UK Finance Director, who leads broader finance team and work closely with the business. In addition, the operations are also supported by the tax team and external reputable advisors.

### **Approach to business transactions (incl. tax planning)**

The business only undertakes transactions that are consistent with and support business objectives and activities. All transactions are undertaken for commercial purposes. We ensure that the positions taken are consistent with the relevant tax laws and aligned with the economic substance of the business transactions to which they relate.

As part of the business transactions we assess taxation implication(s) and where appropriate claim available statutory reliefs and incentives. Given our desire to maintain certainty and strong compliance we also rely on external reputable professional advisors, where appropriate.

### **Level of tax risk we are prepared to accept**

In line with the Code of Conduct and as set out above, we set high minimum standards and expect adherence to and meeting of laws and regulations. In relation to tax, we seek to maintain certainty and adopt a conservative and a low-risk approach.

Both the finance and tax teams are responsible ensuring that approach to tax risk is in line with the above and as set by the Board. The relevant tax risks are identified, evaluated, mitigated and monitored together with input from external advisors, where required. For example, this includes obtaining support with tax compliance and filings of returns.

### **Approach to dealings with HMRC**

LumiraDx Group is committed to maintaining a transparent and open relationship with HMRC. Relationships with HMRC is based on the principles of transparency and good faith.

We seek to respond to all questions in a timely and complete manner. If and where, there are significant matters we seek to discuss in advance with HMRC and/or obtain external professional advice.