

This tax strategy statement details our approach to the tax governance of Ortho Clinical Diagnostics which includes the group entities operating in the United Kingdom (collectively the “UK Group”), and is published in accordance with the requirements of Paragraph 16(2), Schedule 19 of the Finance Act 2016 for the financial year ended 29 December 2019.

Introduction

Ortho Clinical Diagnostics (“the Company”) is a leading global provider of in-vitro (“IVD”) solutions for screening, diagnosing and monitoring diseases. Our products are sold in approximately 130 countries, and we have a direct commercial presence in more than 30 countries.

Our business activities around the world incur a substantial amount and variety of business taxes. Taxes incurred by the Company include corporate income taxes, customs duties, excise taxes, employment and many other business taxes in all jurisdictions where applicable. In addition, the Company collects and pays employee taxes and indirect taxes such as Value Added Taxes (“VAT”).

Governance, Risk Management and Compliance

The Company has a corporate responsibility to act with integrity in all matters – tax included. Specifically, the Company’s Code of Conduct (the “Code”) is designed to promote i) integrity in all that we do; ii) honest and ethical conduct in all situations; iii) compliance with all applicable laws, rules and regulations and iv) accountability for adherence to our Code. This Code extends to compliance with all applicable tax laws, regulations and obligations in each of the countries within which the Company operates. This approach to taxation has been approved by the Company’s Board of Directors (the “Board”), and is under the control of the Global VP of Tax, and managed on a day to day basis by the centralized tax and in-country Finance teams (including that of the UK Group).

The Company actively manages tax risks that inherently arise in a multinational group in a consistent manner to ensure compliance with applicable regulatory requirements and relevant laws and regulations and to protect our shareholder’s long term interests. Where taxation matters present significant uncertainty or complexity, we seek external professional expert advice.

The Company has established and maintains robust policies and compliance processes to ensure the integrity of our tax returns, and timely and accurate tax payments in all countries in which we operate. We have suitable qualified internal personnel throughout the Company assisting in managing the tax function on a day to day basis, who are supported by a centralized Tax Department which has global responsibility for management of the Company’s tax affairs. The Company maintains a detailed set of tax operational guidelines and internal controls aimed at ensuring a sound tax control environment. We also seek continuous external professional advice to ensure that we remain current with changes in tax legislation and disclosure requirements.

Tax Planning

In order to maximize the value to our shareholders, the Company seeks to take advantage of available tax incentives, reliefs and exemptions where applicable in the countries in which it operates. In addition, the Company continues to monitor developments in the Organization for Economic Development's ("OECD") work on Base Erosion and Profit Shifting ("BEPS") and Country by Country Reporting ("CBCR") and seeks to ensure continued compliance in our intercompany transactions and the structuring of our commercial affairs.

Relationship with Tax Authorities

The Company seeks to maintain professional and transparent relationships with tax authorities. We ensure there is access to relevant information demonstrating the integrity of our tax processes, returns and payments. Disclosures are made in accordance with relevant local reporting requirements as well as applicable reporting requirements and standards under United States Generally Accepted Accounting Principles ("US GAAP").

Acceptable Levels of Tax Risk

The Company's approach to tax risk is imbedded within our broader business risk management and compliance framework. We focus on the discovery, development and commercialization of IVD solutions for screening, diagnosing and monitoring diseases. We are committed to providing customers with safe and dependable products, instruments and technologies. We manage tax risks in the context of our business transactions.