

Introduction

CrowdStrike UK Limited has a principal activity of providing sales, marketing, operational and professional services for its parent company. The parent, CrowdStrike Holdings Inc, provides cloud delivered cyber security solutions via a SaaS subscription based model.

The tax strategy of CrowdStrike UK Limited and its UK subsidiaries (the “UK Group”) of CrowdStrike Holdings Inc (“CrowdStrike”) is to pay the correct amount of tax, on a timely basis, to the relevant taxing authority. This strategy applies to the UK Group in accordance with its responsibilities under paragraph 19(2) of Schedule 19 of the Finance Act 2016 (“the Schedule”) and applies for the year ending 31 January 2022.

Approach to Tax Governance

Tax strategy and related compliance regimes are the responsibility of the Board of Directors of CrowdStrike (“the Board”). The Board has delegated responsibility for the day-to-day implementation of the tax strategy to the Group Finance team. This team has overall responsibility for CrowdStrike’s financial reporting systems, including risk management and internal controls. This responsibility also covers the management of taxation. The Group Finance team is led by the Chief Financial Officer (“CFO”) of CrowdStrike, supported by experienced finance professionals which includes an in-house tax team. The in-house tax team is led by the CrowdStrike’s Vice President of Tax, and made up of experienced and qualified tax professionals in the United States, India and the United Kingdom. The in-house group tax function is tasked by the CFO to ensure that review and assessment of tax risks affecting the UK is performed on an ongoing basis.

The UK Group’s tax strategy is consistent with CrowdStrike’s Code of Ethics. The underlying expectations of CrowdStrike’s ethics are honesty and openness.

Risk Management

The UK Group actively manages its tax law compliance and tax risks with processes and internal control. As part of a the CrowdStrike Group, with the ultimate parent listed on NASDAQ, the UK Group is subject to the Sarbanes Oxley control frameworks. Specific controls exist to manage tax risks. In addition to the control environment the tax team is resourced with properly experienced staff. Through such procedures and actions the UK Group seeks to reduce the level of tax risk arising from its operations.

The in-house team engages with internal stakeholders to provide clarity and guidance on tax consequences of business and commercial decisions.

We continuously monitor changes to tax legislation. Where there is significant uncertainty or complexity in relation to a risk, or where specialist knowledge is required, external advice will be sought.

Tax Planning

In structuring its commercial activities, the UK Group will consider, among other factors, local tax laws, with a view to maximising value on a sustainable basis for its shareholders partners and employees.

Any structuring that is undertaken will give due regard to commercial and economic substance and to the potential impact on the UK Group's reputation and broader goals.

The Group Finance staff and the in-house tax team are expected to adopt this approach in all tax matters and to maintain the high ethical standards demanded by the professional bodies to which they belong.

The UK Group will, as additional support, seek advice from accounting firms, legal firms and tax counsel who have experience of working with large international groups to ensure it has interpreted tax law correctly and in line with the intentions of Parliament.

Tax risk

CrowdStrike is committed to compliance with UK tax laws. The UK Group's tax matters are managed with transparency and honesty. Complete and accurate disclosures are encouraged, expected and required for identified or perceived tax risk.

The UK Group has a low risk approach to tax, this includes both operational tax risks and any tax planning opportunities.

The UK Group has a zero-tolerance approach to tax evasion and the facilitation of tax evasion by its employees and associated third parties.

Relationship with HMRC

The UK Group engages with HMRC, with honesty, integrity, and respect. The UK Group will look to resolve any matters through co-operative, open and pro-active discussions with HMRC. The UK Group, to this end, ensures it meets its compliance obligations. Where there could be uncertainty relating to new tax legislation or uncertainty over the tax consequences of a commercial transaction, the UK Group will seek third party professional advice and discuss this proactively with HMRC. The UK Group will in such circumstances look to work with HMRC to ensure the correct amount of tax is paid.