

## **QORVO UK GROUP TAX STRATEGY**

In compliance with section 161 and section 19(2) of schedule 19 Finance Act 2016, Qorvo Inc. ("Qorvo", "we" or the "Company") is publishing its UK tax strategy which applies to all Qorvo companies organized in the UK:

- Qorvo UK Limited
- RFMD (UK) Limited

Qorvo's overall tax strategy aims to support its business by maintaining an appropriate tax rate, while mitigating tax risks and complying with the rules and regulations of the jurisdictions in which the Company operates. Qorvo seeks to balance its responsibilities for controlling tax costs with its responsibilities to pay tax where it does business. More specifically, Qorvo's overall tax strategy is to:

- Meet all legal requirements and to timely make all appropriate tax returns and tax payments.
- Seek to utilize available tax reliefs and incentives where available in a manner which is consistent with the government's policy objectives.
- Consider the tax impact in major or complex business decisions, for example acquisitions.
- Operate in an environment where we consider tax in the context of our reputation and brand.
- Comply with appropriate tax risk processes and ensure that through its Audit Committee there is Board oversight into this compliance.

### **Approach to tax risk management and governance arrangements**

Qorvo is committed to comply with the tax laws and practices in all the jurisdictions in which we operate, including the UK. Compliance for Qorvo means paying the right amount of tax, in the right place, at the right time.

Qorvo's Code of Business Conduct and Ethics sets out what is expected of every employee at Qorvo. Our approach to tax aligns with such standards and is approved, owned, and overseen by the Company's Audit Committee of the Board of Directors.



### **Attitude toward tax planning**

In structuring Qorvo's commercial activities, we consider – among other factors – the tax laws of the countries within which we operate with a view to maximizing value on a sustainable basis for our shareholders. All transactions will have commercial and economic substance and will have regard to the potential impact on our reputation and broader Company goals.

We conduct transactions between Qorvo group companies on an arm's length basis.

### **Level of tax risk accepted**

We understand the importance of tax in the wider context of business decisions and have processes in place to ensure tax is considered as part of our decision-making process.

Qorvo has an in-house tax function with experienced tax professionals and relationships with experienced and competent professional advisers in the jurisdictions in which the Company operates that provide expert advice on local tax and specialized areas of tax. Our approach is to ensure we are compliant and understand our responsibilities with regards to all taxes.

The Board is conscious of the reputation risk and sees strong internal processes and a good relationship with our professional advisers as the best way to manage this reputational risk.

### **Approach to dealing with tax authorities**

We engage with tax authorities, including HMRC, with honesty, integrity, respect and fairness and in a spirit of cooperative compliance.

Qorvo's aim is to have professional and constructive relationships with tax authorities. When disputes arise with tax authorities, we seek to provide full disclosure of all relevant facts and circumstances and maintain open and constructive discussions with a view to reach a fair resolution of such matters. From time to time, if it is unclear how a tax law should be applied, we may engage with tax authorities in advance of undertaking a transaction to confirm the correct application of such tax law.