

BeiGene UK Tax Strategy

For the financial year ended 31 December 2023, the BeiGene Group is required to present the Group's UK Tax Strategy for BeiGene, Ltd and its UK subsidiaries. The publication of this strategy statement is regarded as satisfying the statutory obligation under paragraph 19(2), Schedule 19, Finance Act 2016 for the UK companies within the BeiGene Group.

The policy will be reviewed annually.

Introduction

BeiGene is a global, commercial-stage biotechnology company focused on discovering, developing, manufacturing, and commercializing innovative medicines to improve treatment outcomes and expand access for patients worldwide.

BeiGene is committed to transparency in the conduct of its business. BeiGene pays the required amount of all taxes it owes, including corporate income taxes, employment, and other indirect taxes, in compliance with the tax laws and regulations in the various jurisdictions where it conducts business.

In accordance with the BeiGene Group's commitment to transparency, this document sets out:

- Its approach to governance, risk management and compliance with UK tax laws
- Its approach to tax planning as affecting UK taxation
- The level of UK tax risk it is prepared to accept
- Its approach towards dealings with HMRC.

Governance, risk management and compliance with UK tax laws

The BeiGene UK entities are committed to compliance with tax laws and full, accurate, and timely disclosure to HMRC.

Tax compliance for BeiGene means paying the right amount of tax at the right time. It involves full disclosure of relevant facts and circumstances to HMRC. Responsibility for BeiGene's compliance with UK tax law rests with the Vice President of Global Tax. The Vice President of Global Tax reports to directly to the Chief Financial Officer. Both the Chief Financial Officer and the Vice President of Global Tax report to the Audit Committee and the Board of Directors on a regular basis in relation to the tax affairs and risks of BeiGene.

An experienced group of tax professionals manage BeiGene's tax costs and risks with oversight by our finance function and audit committee.

The BeiGene UK entities are not required to file a Senior Accounting Officer certificate. However, as part of the continuous review of controls and procedures, the internal audit team examines areas of the business and its processes, including tax.

External tax advisors are consulted to provide specialist input on significant tax matters, and in cases of uncertainty. External tax advisors also review the UK corporate tax returns before filing with HMRC.

BeiGene approach to tax planning as affecting UK taxation

BeiGene neither tolerates nor facilitates tax evasion.

BeiGene applies the OECD transfer pricing guidelines to intercompany transactions.

The structure of transactions is guided by BeiGene's commercial strategy, with the tax impact as one of a number of factors which are considered.

Where BeiGene's UK entities seek to take advantage of available tax incentives, reliefs and exemptions, these are consistent with the spirit as well as the letter of the tax law.

BeiGene UK entities do not seek to create artificial tax positions. BeiGene seeks external advice on areas of uncertainty, and significant tax matters and transactions, including for example benchmarking analysis to support transfer pricing arrangements.

The level of UK tax risk BeiGene is prepared to accept

The BeiGene UK entities seek to comply fully with their regulatory obligations and ensure tax arrangements are consistent with a low tax risk approach to conducting its business.

The BeiGene UK entities do not seek to structure transactions in ways that give tax results inconsistent with their underlying economic consequences.

Where the tax treatment of any material transaction is uncertain, external tax advice will be sought before proceeding with the transaction.

BeiGene approach towards dealings with the HMRC

Our aim is to be open and transparent and have a professional, courteous, and constructive relationship with HMRC and other tax authorities we deal with worldwide.

Where we receive queries from HMRC or other tax authorities, in particular where interpretation of tax laws is unclear or differs, we endeavor to enter into transparent discussions with HMRC, which we conduct in a responsible, fair and timely manner.