

HOLOGIC®

UK Tax Strategy – Overarching Philosophy

Hologic is an innovative medical technology company primarily focused on improving women's health and well-being through early detection and treatment. Given this unique mission, abiding by our Code of Conduct is critically important in everything we do. Like other management responsibilities, our tax strategy is underpinned by our Code of Conduct, our values and our principles.

This document sets out the tax strategy and strategic tax objectives for the UK subsidiaries and investments of the Hologic Inc. group ("Hologic") in respect of the financial year ended 30 September 2020. This tax strategy has been developed to comply with the duty set out in paragraph 19(2) of Schedule 19 of the UK Finance Act 2016 requiring UK sub-groups to publish a UK Tax Strategy.

The way we manage tax allows us to deliver value to key stakeholders in a sustainable and compliant way. We manage tax by focusing on the below objectives:

UK Tax Strategy – Guiding Principles

1. ***Tax governance and risk management: We are committed to strong tax governance, with a robust system of risk management and controls.***

Our Code of Conduct sets out the standards of behaviours which every person conducting business for the Hologic UK group must follow. The honesty, integrity and sound judgement of Hologic's UK Senior Financial Officers is fundamental to the Financial Reporting process and the reputation and success of the Hologic UK group. The UK Board of Directors is ultimately responsible for establishing the overall tax governance. The Vice President of Tax and the Tax Director, International, have key oversight and responsibility for monitoring the day to day operation of tax. Any issues are escalated to the Vice President of International Finance, and to the Board by the Vice President of Tax as appropriate.

In addition to efforts undertaken by the Board of Directors, there is also reliance on the global Audit and Finance Committee to assist with the oversight of the Group's Financial Reporting process, accounting functions, internal audit functions and internal controls. We operate a robust risk management framework which facilitates the capturing of key risks and mitigate them through the operation of effective controls. Our governance processes require that management provide regular enterprise-wide risk assessments and tax risk assessments to our UK Board of Directors in order for the Board to assess the major risks facing the UK Group. The Vice President of Tax will also periodically report to the UK Board on material tax matters. There is also a formalised decision-making process to ensure any decisions are made at the appropriate level (up to and including the group Board) with Tax reviewing any material corporate transactions. In addition, external advisors are consulted as necessary to properly assess any tax related risks.

In accordance with UK tax legislation the Senior Accounting Officer ("SAO") certifies annually that Hologic's UK group has established and maintained appropriate tax accounting arrangements, such that all taxes have been calculated accurately in all material respects. We undertake regular reviews to monitor and assess the appropriateness of the tax accounting arrangements, implementing best practice and process improvement initiatives where identified. This enables us to identify risks in a timely manner and provides a forum for agreeing risk management strategies.

2. *Attitude towards tax planning and approach to tax: Creating long-term sustainable growth whilst obeying all applicable laws and regulations.*

The Hologic UK group is owned by a public company and it is imperative that our communications to the public provide full, fair, accurate, timely and understandable disclosure. Our approach to tax and tax planning is carefully aligned to our strategic and corporate objectives and compliance is core to what we do. We aim to comply with all applicable tax laws and regulations; however we will participate in legitimate tax incentives, exemptions and reliefs which are offered by the UK Government to taxpayers.

Transactions are underpinned by commercial activities and objectives. We will, however, consider the most tax efficient way to undertake business transactions. Though we strive to be tax efficient in order to grow our business, we will only engage in reasonable tax planning that is aligned with our business or operational objectives. All transactions will follow the arm's length principles in line with our Transfer Pricing policies. Furthermore, in line with our principles, we seek to be compliant by following the principles of the OECD guidelines.

3. *Level of risk in relation to UK taxation that the group is prepared to accept: Continuous assessment and mitigation of tax risk to a low level.*

Our appetite for tax risk in relation to UK taxes is low. The level of risk is assessed and mitigated continuously by the Tax Team and supported via the governance procedures in place and the oversight of the UK Board of Directors.

In order to manage our levels of risk we actively engage with HMRC to discuss and agree on positions where ambiguity or complexity exists. In addition, support from external advisors will be sought to ensure that risks are fully assessed, and, where uncertainty exists, to ensure all tax positions taken are reasonable under the law. We monitor changes in legislation and tax guidance in order that we can remain compliant with our obligations in relation to UK taxes.

4. *Relationship with HMRC: Communicating openly and honestly with all our stakeholders.*

As described in our Code of Conduct, our fundamental values include honesty, integrity, respect and trust. We seek to be cooperative in all our dealings with HMRC and we maintain a proactive relationship, encouraging open dialogue on a timely basis. Where any tax law is unclear or subject to interpretation, we will engage with external tax advisers to ensure we remain compliant in all operations. Where applicable we will work with HMRC to attempt to resolve any differences in a timely and professional manner.

5. *Partnering with the wider business on Tax: Building team spirit and confidence.*

The Tax team are equipped with the knowledge required and are always consulted prior to any significant business transactions. The business collaborates closely with the Tax Team to ensure operational and commercial decisions consider the UK tax impact in light of the Hologic UK group's tax objectives and Code of Conduct.

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