# AmerisourceBergen Corporation Tax Strategy in the UK

### **Background**

AmerisourceBergen ("AB"), a leading global healthcare company, publishes this Tax Strategy Statement in accordance with the requirements of the United Kingdom ("UK") Finance Act of 2016 ("the Act").

The Tax Strategy Statement applies to the year-end **30 September 2023**.

The AB Senior Vice President of Tax serves as the head of global taxes and is responsible for overseeing global tax risk management, tax governance and tax compliance issues for AB. The AB Vice President International Tax reports to the AB Senior Vice President of Tax and is responsible for all UK tax risk management, UK tax governance and UK tax compliance issues.

AB has a longstanding commitment of adherence to sound corporate governance to ensure the highest standards of responsibility, ethics, and integrity in accordance with its Corporate Governance Principles and Code of Ethics and Business Conduct ("the AB Code of Ethics"), which are posted at <a href="https://investor.amerisourcebergen.com/governance/policies/default.aspx">https://investor.amerisourcebergen.com/governance/policies/default.aspx</a>

On January 24, 2023 AB announced its intention to change its name to **Cencora**. The name change will be effective at the parent entity from 30 August 2023.

## Our Risk Management and Governance Arrangements in Relation to UK Taxation

AB's UK affiliates and their directors, officers and employees are committed to compliance with UK tax laws, regulations, and practices. Consistent with the AB Code of Ethics requirement to comply with all applicable laws and regulations, AB's UK affiliates and their directors, officers and employees operate in full compliance with all applicable UK tax laws and regulations, including the timely filing of all required tax returns, reports, and disclosures, paying the appropriate amount of UK tax at the required time, and the maintenance of required records and documentation supporting all UK tax return filings and payments.

To fully support AB's UK affiliates in compliance with UK Taxation, AB has assembled an internal international tax team of 10 individuals (including the AB Vice President International Tax) based in the UK. This tax team has a broad range of experience and deep technical knowledge to best assist the UK affiliates and their directors, officers and employees to comply will all elements of UK tax laws and regulations.

#### We Have a Low Level of Risk Tolerance in Relation to UK Taxation

AB's UK affiliates and their directors, officers and employees exercise reasonable care and due diligence with respect to compliance and planning issues with the objective of minimizing potential UK tax risk. We therefore have a low tax risk tolerance in the UK. Depending on the complexity and/or the materiality of a potential transaction or compliance issue, external advice, guidance, and support is sought from qualified external advisors and UK subject matter tax experts to eliminate or minimize any UK tax risks that might arise in connection with that UK transaction or UK compliance issue where there may be a question regarding the proper interpretation or application of any UK tax law or regulation.

### **Our Attitude Towards Tax Planning**

Where relevant, tax planning for UK transactions is undertaken while ensuring compliance with the applicable UK tax laws and regulations and consistency with

the underlying economic substance and the business purpose of the transactions. External advisors and UK subject matter tax experts are relied upon to ensure that tax planning for material or complex UK transactions reflects a proper technical and reasonable interpretation of the applicable UK tax laws and regulations.

# Our Approach Towards Our Dealings with His Majesty's Revenue & Customs ("HMRC")

AB's UK affiliates and their directors, officers and employees are committed to fully cooperate with HMRC and its representatives in a transparent, collaborative, and professional manner. We have regular dialogue with our Customer Compliance Manager at HMRC which enables a two way flow of information and allows the Group to ensure it is meeting all its UK tax compliance obligations.

#### Conclusion

This Tax Strategy Statement, first effective for the year ended September 30, 2017, has now been updated as required by the Act for the year-ended September 30, 2023. This tax strategy is subject to annual review.

This Tax Strategy Statements applies to **all UK entities of the AB Group** (a summary of relevant Divisions is provided below with explanatory notes) and has been published in accordance with the requirements of the Act at the following locations;

https://www.alliance-healthcare.co.uk/ https://www.mwiah.co.uk/additional-corporate-policies www.pharmalex.com/country/pharmcautical-consultants-uk/

Relevant Divisions operating i	in the L	JK within	the AB Group
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World Courier

Alliance Healthcare

MWI Animal Health

Xcenda UK

PharmaLex<sup>1</sup>

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<sup>&</sup>lt;sup>1</sup> Effective as of January 1, 2023, AB acquired the PharmaLex Group of Companies which comprised 3 UK groups as follows; PharmaLex, Phlexglobal and NeoHealthHub. This Tax Strategy Statement applies to these entities for the period from January 1, 2023 to September 30, 2023.