

CINCINNATI BELL UK TAX STRATEGY

Scope

In compliance with Section 19(2) of Schedule 19 of the Finance Act 2016 of the United Kingdom (“UK”), Cincinnati Bell hereby publishes the following UK Tax Strategy on behalf of CBTS UK and OnX UK both of which are currently operating in the UK.

This UK Tax Strategy is effective for the current financial year ending December 31, 2019 and years prior beginning with the financial year ending December 31, 2016.

Overview

Cincinnati Bell is committed to full, fair, accurate, and timely compliance with all statutory obligations and full disclosure of its commercial dealings to tax authorities in all jurisdictions in which it operates. In accordance with UK legal requirements in this regard, this UK Tax Strategy documents our approach to:

- Governance, risk management and compliance with UK tax laws
- Tax planning as affecting UK taxation
- The level of UK tax risk we are prepared to accept
- Our relationship with the HMRC

Governance and Risk Management

Cincinnati Bell’s global tax strategy and compliance is ultimately the responsibility of its Board of Directors. The Board of Directors has delegated to the Audit Committee the role of monitoring the integrity of Cincinnati Bell’s financial statement preparation and reporting, including compliance with internal controls and the risk management framework relating to taxation. The Chief Financial Officer has executive responsibility for tax matters. Day-to-day management of the tax function is handled by the Senior Director of Tax, reporting to the Entertainment and Communications division Chief Financial Officer, who in turn reports to Cincinnati Bell’s Chief Financial Officer. Cincinnati Bell has a staff of qualified tax professionals at the headquarter location in the United States. This group coordinates with the CBTS Chief Financial Officer, Finance Directors and associated accounting staff related to tax strategies impacting Cincinnati Bell’s UK subsidiaries. Cincinnati Bell also utilizes outside tax and legal advisory firms to augment this staff and ensure accurate and timely compliance with all statutory obligations.

Tax Planning

Cincinnati Bell seeks to minimize taxes when entering into commercial transactions by taking advantage of tax incentives, reliefs, and exemptions that align with both the letter and spirit of enacted tax legislation. Cincinnati Bell does not undertake tax planning without realistic business purpose or economic advantage.

UK Tax Risk

Cincinnati Bell accepts only those risks in relation to UK taxation that are consistent with its Corporate Governance Guidelines, Code of Ethics, and Code of Conduct. This information can be found on the Cincinnati Bell website. Consistent with these principles, Cincinnati Bell at all times seeks to comply fully with its statutory, regulatory and ethical obligations, and to maintain its reputation as a responsible corporate citizen. Risks inherent in interpreting enacted tax legislation and in applying it to various transactions and in taking tax filing positions are fully vetted by Cincinnati Bell tax professionals and tax advisors.

Relationship with HMRC

Cincinnati Bell is committed to maintaining an open and transparent relationship with tax authorities in all jurisdictions in which it operates, including the UK with the HMRC. To this end, Cincinnati Bell intends to consistently make clear, complete, and accurate disclosures in all tax filings with the HMRC, and to engage in all correspondence with the HMRC in a prompt, courteous, and professional manner. In the event of differing interpretations of tax law or regulation, Cincinnati Bell will strive to reach consensus with the HMRC and achieve certainty in the appropriate tax treatment of its commercial activities in the UK whenever possible.