

# UNITED KINGDOM | TAX STRATEGY

## INTRODUCTION AND SCOPE

Raytheon Company (“Raytheon”) is a technology and innovation leader specializing in defense, security and civil markets throughout the world. Raytheon provides state-of-the-art electronics, mission systems integration and other capabilities in the areas of sensing; effects; and command, control, communications and intelligence systems, as well as cyber security and a broad range of mission support services.

The United Kingdom Finance Act of 2016 (the “Act”) requires companies to annually publish a statement regarding their tax strategy. This statement and strategy contained within it applies to Raytheon’s United Kingdom subsidiaries listed below, and serves to comply with the Act’s requirements from the date of publication until it is superseded.

## APPROACH TO RISK MANAGEMENT AND GOVERNANCE

Raytheon’s United Kingdom subsidiaries manage tax risks to ensure compliance with legal requirements, including the timely payment of taxes required by law. We require multiple levels of review to ensure we employ diligent professional care and judgment to identify, evaluate, monitor, and manage potential tax risks. Our staff are appropriately trained and experienced, and we also may seek advice from third party advisors in cases of uncertainty or complexity in relation to tax risk.

Local management or in-house tax management is in charge of compliance, and senior management of the worldwide group oversees the tax strategy, which applies to Raytheon’s United Kingdom subsidiaries.

## ATTITUDE TOWARDS TAX PLANNING

Raytheon’s United Kingdom subsidiaries make a good faith effort to remain compliant with the tax laws of the United Kingdom while remaining focused on creating sustained value for our shareholders. We engage in tax planning that is supported by the law, integrated with our business, reflects commercial reality and economic activities, and is aligned with [Raytheon’s Code of Conduct](#). This includes prudently claiming all relevant tax incentives and reliefs available under United Kingdom law.

When appropriate, we seek advice from international accounting firms, law firms, and other professionals specific to the United Kingdom. We also collaborate with external advisors to ensure tax implications of relevant business developments are properly understood taking into account changes in United Kingdom tax law, and compliance requirements in the United Kingdom.

## LEVEL OF RISK

The level of risk that Raytheon’s United Kingdom subsidiaries accepts is consistent with our overall objective of achieving tax certainty, creating value for shareholders, and being a good corporate citizen. We do not engage in activities that compromise our companies’ strong reputation, and core values of collaboration, innovation and accountability.

## APPROACH TO WORKING WITH HMRC

Raytheon’s United Kingdom subsidiaries foster and maintain a professional and positive relationship with HMRC based on transparency, integrity, and cooperation. We strive for early agreement on areas of uncertainty wherever possible. We communicate relevant changes in our business activities, their tax treatment, and legal interpretations of tax laws, regulations and rulings pertaining to the taxes affecting our United Kingdom business activities.

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## **LIST OF ENTITIES COVERED BY THIS TAX STRATEGY**

Data Logic Properties Limited  
Forcepoint Cloud Limited  
Forcepoint Overseas Limited  
Forcepoint UK Limited  
Javelin (UK) Limited  
Penmar & Company Limited  
Raycab (North) Limited  
Raycab (South) Limited  
Raytheon Aircraft Services Limited  
Raytheon Limited  
Raytheon Systems Limited  
Raytheon United Kingdom Limited  
Raytheon United Kingdom Holdings Limited  
SurfControl China Limited  
SurfControl Limited  
Websense SC Holdings Limited  
Websense SC Operations Limited