



CARDTRONICS GLOBAL TAX POLICY DOCUMENT

This tax policy applies to all Cardtronics Group companies ('Cardtronics', 'Company' or 'Group').

Governance and Code of Conduct

- This tax policy document has been reviewed by the Company's Executive Management and is maintained by the Group's Tax team. Periodic amendments shall be proposed by the Group's Tax team for the review and approval by Company Executive Management.
- The Company is proud of the values with which it conducts its business. It has and will continue to uphold the highest standards of business ethics and personal integrity in all of its transactions and interactions.
- In accordance with the Company's Code of Business Conduct and Ethics, obeying the law is the foundation on which the Company's ethical standards are built. In conducting the business of the Company, all directors, officers, and employees shall comply with applicable governmental laws, rules and regulations at all levels of government in the United Kingdom, the United States and in all other jurisdictions in which the Company does business, including applicable European Union laws, rules and regulations.

Management of tax risk

- As a large multi-national organisation, with operations across the globe, the Group's acceptable level of tax risk is managed within the overall risk framework and risk appetite of the group, which is reviewed by our Board of Directors.
- The Group is exposed to a variety of tax risks. These can be grouped under the following headings:
 1. **Tax compliance and reporting risks**, which cover risks associated with compliance failures such as submission of late or inaccurate returns, the failure to submit claims and elections on time or where finance or operational systems and processes are not sufficiently robust to support tax compliance and reporting requirements.
 2. **Transactional risks**, which arise where transactions are carried out or actions are taken without appropriate consideration of the potential tax consequences or where advice taken is not correctly implemented.
 3. **Reputational risk** looks beyond financial risks to the wider impact tax risk may have on our relationships with our stakeholders, including shareholders, clients, employees, suppliers, lenders, tax authorities and the general public.
- Group Tax is made up of a team of tax professionals based in London, UK, and Houston, TX, USA. The Group Tax Team oversees tax risk across all of our operational business lines, provides advice on

tax-related issues, undertakes or assists with tax filings, manages relationships with tax authorities and assists with various forms of tax and financial reporting. Internal controls and escalation procedures are in place with the aim of identifying, quantifying and managing key risks.

- Where appropriate, the Company engages with tax authorities to resolve issues, risks, and areas of uncertainty. The inherent nature of sometimes ambiguous and frequently changing tax rules may occasionally result in a difference of opinion on an interpretation of tax law. The Company applies its best judgement in these situations.

Tax compliance and relationship with tax authorities

- We seek to comply with our tax filing, tax reporting and tax payment obligations globally.
- We look to maintain open and transparent relationships with the tax authorities in the key jurisdictions in which we operate, such as HM Revenue & Customs. This may take the form of discussing key developments in our business and the potential impacts of those developments. Equally, it may involve disclosing and seeking to resolve a known issue prior to the filing of the relevant tax return.

Tax planning

- Cardtronics recognises that it has a responsibility to pay the appropriate amount of tax in each of the key jurisdictions in which it operates. We aim to balance this with our responsibility to our shareholders to structure all of our affairs across the Group in an efficient manner. Accordingly, we may utilise tax incentives or opportunities for obtaining tax efficiencies where these:
 - are legal;
 - are not considered to carry significant reputational risk or significant risk of damaging our relationship with the tax authorities in the jurisdictions in which we operate,
 - are aligned with the intended policy objectives of the governments which introduced the incentives, and
 - are aligned with our business or operational objectives.
- External advice and guidance from its advisors and local tax authorities may be sought in relation to tax planning or areas of complexity or uncertainty to support the Group in complying with its tax policy.

Transparency

- We support initiatives to improve international transparency on taxation matters. As required by jurisdiction, we follow OECD measures on country-by-country reporting and automatic exchange of information.
- We do not tolerate tax evasion, nor do we tolerate the facilitation of tax evasion by any person(s) acting on the Group's behalf.

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It is the intent of Cardtronics plc that this tax policy document complies with the duty under paragraph 16(2) of Schedule 19 of the Finance Act 2016 to publish the Group tax strategy for the year ended 31 December 2020.