



DROPBOX TAX STRATEGY

SCOPE OF POLICY

Pursuant to Schedule 19 of the UK Finance Act 2016, this document sets out the UK tax strategy for Dropbox UK Online Limited (“Dropbox UK”), a subsidiary of Dropbox, Inc. (“Dropbox”). The strategy is published in accordance with paragraphs 19(2) and 22(2) of the Schedule for the year ended 31 December 2022.

GOVERNANCE

Dropbox UK’s overall tax policy is to comply with applicable UK laws, rules, regulations, reporting requirements and to pay taxes that are legally due and in line with the tax legislation.

The Chief Tax Officer reports directly to the Chief Financial Officer and is responsible for the implementation of Dropbox UK’s tax strategy. The day-to day tax matters are managed by the internal tax team. The Chief Tax Officer and internal tax team are predominantly located in the United States. The Chief Financial Officer and the Board’s Audit Committee are informed of the company’s overall tax matters. Additional assistance from professional advisors is sought on an ad hoc basis when required.

RISK MANAGEMENT

Tax risk is considered as part of Dropbox’s broader business and risk management processes. Dropbox continuously monitors changes to tax law, as changes in UK tax legislation or tax rulings, or changes in interpretations of UK existing laws, could materially affect Dropbox UK’s financial position and results of operations.

Dropbox UK’s tax positions are based on commercial and economic activities. The tax team partners with the business to evaluate changes in operations to ensure any new tax requirements are adhered to and that intercompany related activities are transacted in accordance with OECD transfer pricing principles. Dropbox may seek to manage tax risks by engaging external tax advisors for guidance on UK tax laws that are new, complex or uncertain to ensure compliance.

TAX PLANNING

Dropbox is committed to compliance with all relevant laws and the timely fulfillment of tax obligations. Dropbox aims to ensure that the tax model aligns with the commercial objectives and overall business strategy. In circumstances where there are complexities with the tax laws or interpretations that may result in differing tax outcomes, Dropbox engages external accounting firms and/or tax counsel for guidance. The level of risk which Dropbox accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the group's tax affairs.

APPROACH WITH HIS MAJESTY'S REVENUE & CUSTOMS (“HMRC”)

Dropbox UK's current communications with HMRC are focused on timely return compliance and responses to queries. Dropbox engages external tax advisors to act as our agents who liaise with HMRC on Dropbox UK's behalf.

Dropbox considers that there is an open and constructive relationship with HMRC and is committed to working with them in a compliant and collaborative manner.