

# Tax Strategy

Approved by the Board of Directors

May 8, 2019



# Purpose

This Tax Strategy outlines how TELUS Corporation, including its controlled subsidiaries (collectively referred to as “TELUS”), manages its tax affairs, i.e. income, indirect and property taxes (collectively referred to as “Tax(es)” or “Taxation”), in all jurisdictions where TELUS operates. TELUS’ Taxation team of business professionals deliver the best solutions for TELUS and our customers, managing TELUS’ Tax risk in a manner that is conservative, ethical, transparent and collaborative while complying with all applicable Tax laws and regulations.

## Tone from the Top

At TELUS our goal is to demonstrate the highest level of ethics and integrity in our business dealings with all stakeholders (including our customers, shareholders, suppliers, colleagues, communities and governments). All members of the TELUS team are required to act honestly in all dealings, comply with laws and regulations governing our businesses and maintain an ethical working environment.<sup>1</sup>



## Team

### TELUS:

- Hires qualified tax professionals who maintain an up to date knowledge of all relevant Tax law/jurisprudence and/or related Tax accounting pronouncements;
- Applies high ethical standards at all times in dealing with Taxation matters;
- Applies diligent professional care and judgement to arrive at well-reasoned conclusions. All advice and solutions should be clear, timely, relevant, business-focused and value-added;
- Complies with all anti-bribery and anti-corruption laws;<sup>2</sup>
- Requires that all decisions are taken at an appropriate level and are supported with documentation that evidences the facts, conclusions and any significant risks involved. Our Tax Strategy is aligned with the business strategy and the Tax function, operations and activities are aligned with the Tax Strategy;
- Maintains an efficient and effective legal structure; and
- Provides the TELUS Taxation team with the necessary resources to execute this Tax Strategy.

At TELUS, we not only do things right, but we will strive to do the right things.



1. TELUS' Code of Ethics and Conduct can be found at <https://www.telus.com/en/about/policies-and-disclosures/code-of-ethics-and-conduct>

2. TELUS' Anti-Bribery and Corruption Policy can be found at [https://assets.ctfassets.net/rz9m1rynx8pv/1U3oY6RrkrT9lpSYtQiq/Zd2b33b2315c391cfff5484fda305e0e/TELUS\\_\\_\\_\\_Anti-Bribery\\_and\\_Corruption\\_Policy.pdf](https://assets.ctfassets.net/rz9m1rynx8pv/1U3oY6RrkrT9lpSYtQiq/Zd2b33b2315c391cfff5484fda305e0e/TELUS____Anti-Bribery_and_Corruption_Policy.pdf)

## Tax Authorities

**Where tax authorities also desire to develop an open and constructive working relationship with us, we:**

- Proactively manage the relationship with the tax authorities;
- Undertake all dealings with tax authorities, government officials, ministers and other third parties in a professional, transparent, courteous and timely manner; and
- Provide the tax authorities with timely access to all relevant facts regarding our Tax matters.

## Tax Risk Management

**To manage its Tax risk TELUS:**

- Pays its fair share of Taxes by paying the amount of Tax legally due in accordance with the laws and jurisprudence at the time;
- Monitors changes to Tax law and jurisprudence to ensure continued compliance;
- Manages the Tax function centrally headed by a Vice President, Taxation to maintain a consistent standard to mitigate Tax risk;
- Maintains internal controls over financial reporting of Taxes to assure there are no deficiencies or material weaknesses in the financial reporting of Taxes;
- The TELUS Taxation team actively engages with the business to ensure compliance and mitigate Tax Risk;
- Communicates the Tax Strategy within the organization;
- Considers the i) facts, ii) Tax law/jurisprudence technical merits, iii) financial return/risk, iv) brand reputation, and v) corporate and social responsibility when deciding any Tax position. TELUS does not knowingly take a Tax position that is:
  - Not at the very least “more likely than not” to prevail in the courts, or
  - Designed to artificially reduce Tax, such as through abusive Tax shelters or other evasive practices;
- Adopts best practices in complying with the “arm’s length standard” in applicable transfer pricing laws/jurisprudence, as supplemented by the Organisation for Economic Co-operation and Development guidelines;
- Engages with tax authorities positively, in the event of any differences in opinion, while defending our Tax positions where we believe we are applying the relevant legislation/jurisprudence appropriately;
- Seeks professional third-party Tax assistance to supplement our in-house team of professionals, including to provide expert opinions or to assist in dispute resolution and litigation when necessary;
- Has the Vice President, Taxation provide ongoing updates to and take direction from the Executive Vice-President and Chief Financial Officer and other members of management where appropriate and report to the Audit Committee of the Board of Directors on a quarterly basis.

