

UK Tax Strategy

In accordance with Schedule 19 Finance Act 2016, this document sets out the UK Tax Strategy for the year ended 31st December 2017,

1. Tax Strategy

The main focus of BioMarin's UK tax strategy is:

- To ensure that the Group remain compliant with the relevant and applicable tax laws in the UK.
- The submission of tax filings and remittance of tax liabilities on a timely basis.
- To consider the tax impact of major or complex business decisions, for example acquisitions.

Further details relating to the tax strategy are provided below.

2. Risk Management and Governance Arrangements

A function of the tax department is to ensure we have the expertise, resources and processes in place to identify and meet our compliance obligations.

The tax department actively seeks to identify, manage and minimise any tax risks through the employment of sufficiently qualified and trained staff and the use of external advisors where necessary.

The board of the companies with operations in the UK are regularly updated on tax matters. Through this open and regular communication, the tax department provides an update on tax compliance and highlights the importance of managing and minimising tax risk.

3. Attitude towards tax planning and level of risk

BioMarin manages its tax affairs in a tax compliant manner. The aim is to ensure compliance with all statutory obligations and as a consequence attempt to minimise risk wherever possible. BioMarin does not have prescribed levels of acceptable risks but seek to ensure full consideration of the reputational and commercial implications of tax decisions in line with normal business risk procedures

If a position is uncertain the Group obtains third-party advice in order to gain clarity or support for a particular stance or approach.

BioMarin's tax positions and reporting reflects the business activities undertaken in the UK.

4. Relationship with HMRC

BioMarin seeks to have a constructive and cooperative relationship with the HMRC. BioMarin has no pending tax litigation in the UK.