

Liberty Latin America Ltd.'s Approach to Tax

Liberty Latin America Ltd. (“Liberty Latin America” or “the Group”) is a leading telecommunications company operating in over 20 countries across Latin America and the Caribbean¹. The communications and entertainment services that we offer to our residential and business customers in the region include digital video, broadband internet, telephony and mobile services. Our business products and services include enterprise-grade connectivity, data center, hosting and managed solutions, as well as information technology solutions with customers ranging from small and medium enterprises to international companies and governmental agencies. In addition, Liberty Latin America operates a sub-sea and terrestrial fiber optic cable network that connects over 40 markets in the region.

We are committed to conducting our business with integrity and to the highest standards of corporate governance. Our Code of Conduct, which applies to all of our employees, directors, and officers governs our approach in relation to accounting, reporting, taxation and disclosure matters.

Our Vice President of Tax is responsible for defining and delivering our overall tax objective across the Group. Our objective is to comply with all applicable tax laws and regulations, to file all of our tax returns on time, and to pay our tax liability due in each of the territories in which we do business. We manage the execution of this objective while also adhering to our obligation to maximize shareholder value through an optimized tax position.

The taxes we pay are substantial and varied, and include corporate income taxes, withholding taxes, employment taxes, stamp duties, and industry specific taxes. We also collect significant amounts of indirect taxes and employment taxes on behalf of the tax authorities.

Governance and Risk Management

In accordance with the Group’s governance procedures, relevant tax matters are reviewed and approved by members of the Tax Department, including the Vice President of Tax, Director of Tax Accounting and Directors of Tax Planning and Transfer Pricing, respectively, as well as local market tax directors and managers. Our global tax position is regularly shared with the Chief Financial Officer and, when necessary or applicable, is escalated to the Chief Executive Officer. Under the Group’s governance guidelines, certain relevant tax matters are reviewed and approved by the Board of Directors.

The Group’s approach to tax is underpinned by a tax framework of processes and controls. Our Board of Directors and Audit Committee are apprised of our objectives, processes, controls and significant tax risks.

We are committed to applying the law correctly to all our transactions and business activity and therefore seek to minimize our tax risk. We recognize that tax legislation can be complex and subject to interpretation. In addition to relying on the perspective of our internal personnel with appropriate skills and tax knowledge, we solicit independent professional advice when needed to reduce any potential uncertainty.

We identify, communicate and manage tax risks through a tax framework of processes and controls that are applicable to all companies in the Group. Our tax framework defines responsibilities in relation to tax matters, including how tax returns are prepared, how tax risks and tax uncertainties are identified and communicated to the executive leadership team and how tax decisions are taken.

Level of Acceptable Risk

The Group does not target a particular level of acceptable tax risk. Our primary objective is to apply the law correctly to all our transactions and in so doing our aim is to minimize tax risk. Should significant tax uncertainty arise as to how a particular tax matter is to be interpreted, the Group will only adopt a tax filing position in its returns if the advice it receives strongly supports its position as being the correct interpretation in law. Where appropriate, we seek clearances and rulings from the relevant tax authorities.

¹ See Appendix 1

Tax Planning

We undertake planning to optimize our tax position in alignment with the commercial objectives of the business. When undertaking tax planning, we comply with all relevant tax laws and regulations. We carefully consider the tax analysis and risks involved and we ensure that any tax planning is approved through our governance procedures. We will apply to take benefit of tax incentives introduced by governments to stimulate investment where we meet the necessary business and economic requirements. When companies within our Group sell or provide goods or services to/from each other or other related parties, these transactions take place on arm's length terms in accordance with Organization for Economic Cooperation and Development ("OECD") guidelines.

Relationships with Tax Authorities

We aim to have open and transparent relationships with all relevant tax authorities and to engage in regular proactive discussions with tax authorities, particularly where areas of uncertainty are identified, with the aim of agreeing matters quickly and efficiently.

Appendix 1

Liberty Latin America Ltd. is the 100% owner of LGE Coral Holdco Limited, among other entities. LGE Coral Holdco Limited is a UK resident entity. LGE Coral Holdco Limited is the direct and indirect owner of numerous entities, some of which are tax resident in the UK. Liberty Latin America's operations in the UK are specifically attributed to its Cable & Wireless business unit and serve various Group Treasury, Financing and Management functions. The tax strategy put forth above is that of the entire Liberty Latin America group for the period ending December 31, 2019, and is considered to be applicable to all jurisdictions, including the UK. The UK-specific entities intended to be covered by this tax strategy are:

LGE Coral Holdco Ltd ²

- Cable & Wireless Communications Limited
- Cable & Wireless Limited
- Sable Holding Limited
- CWIG Limited
- Cable & Wireless DI Holdings Limited
- Cable and Wireless (Investments) Limited
- CWC Communications Limited
- CWIGroup Limited
- CWC UK Finance Limited
- Cable and Wireless (West Indies) Limited
- Cable & Wireless International HQ Limited
- Cable & Wireless (CALA Management Services) Limited
- Cable & Wireless Services UK Limited
- Cable & Wireless Central Holding Limited
- The Eastern Telegraph Company Limited
- The Western Telegraph Company Limited
- Cable and Wireless Pension Trustee Limited
- Cable & Wireless Trade Mark Management Limited
- Cable & Wireless Carrier Limited
- Cable & Wireless (UK) Group Limited
- CWC Bahamas Holdings Limited
- CWC WS Holdings Cayman Limited
- Sable International Finance Limited (Cayman Islands)

² Published under paragraph 19 – UK sub-group



CWC Cayman Finance Limited³
C&W Senior Finance Limited (Cayman Islands)
C&W Senior Secured Parent Limited (Cayman Islands)
Liberty Global CIHB Ltd ⁴

This statement was approved on 20 December 2019 and is published to comply with the requirements of Finance Act 2016, Schedule 19.

³ This entity was liquidated in September 2019

⁴ Published under paragraph 22 – qualifying company