

RRD - UK Tax Strategy

Introduction

This statement is made pursuant to Schedule 19(2) to the Finance Act 2016 and sets out RRD's policy and approach to conducting and managing its UK tax affairs. In publishing this statement RRD is fulfilling its obligations under the Finance Act 2016.

This statement will be periodically reviewed and updated by the Board of Directors of the Company and is effective for the Company's financial year commencing January 1, 2025 and will be republished annually and will remain in effect until any amendments are made by the Board of Directors.

In this statement references to "the Company" and "RRD" shall be with respect to legal entities within the RRD Parent, Inc. & Subsidiaries group ("RRD") operating in the UK, which include entities within the Williams Lea subsidiary group also operating in the UK, acquired by RRD on January 31, 2025.

Tax Policy

RRD is committed to conducting its tax affairs consistent with the following objectives:

- To comply with all relevant laws, rules, regulations, reporting and disclosure requirements; and
- To apply due professional diligence and care in the management of risks associated with tax matters and in doing so ensure that appropriate governance and assurance procedures are implemented

Principles of Ethical Business Conduct

RRD's Principles of Ethical Business Conduct policy sets out the principles that all employees and officers of RRD are expected to adhere to in all dealings and business matters, including its tax affairs.

A copy of the policy can be found on RRD's website:

<https://investor.rrd.com/governance/governance-documents/default.aspx>

RRD requires that all staff should act with honesty and integrity, in compliance with all applicable domestic and foreign laws and regulations and in accordance with the highest moral and ethical standards of responsibility and accountability in all dealings with customers, potential customers, business partners, suppliers, public officials, competitors and each other. Non-adherence to this policy may constitute a disciplinary matter and could lead to disciplinary proceedings that can ultimately include dismissal.

Tax Risk Management

It is the responsibility of the Board of Directors to handle tax affairs and to take an active role in understanding the tax treatment of material transactions should these occur. Day to day management of the Company's tax affairs is delegated by the board to the Finance function, who are responsible for monitoring the Company's tax risks with internal controls that are put in place to identify, quantify and manage those risks. The Senior Vice President, Global Head of Tax, a senior member of the Finance function, oversees the Company's management of tax risks and where necessary will escalate and discuss relevant issues with the board.

RRD is committed to full compliance with all statutory tax requirements and full disclosure to relevant tax authorities. This includes, but is not limited to seeking to ensure:

- The submission of all UK tax returns on a timely basis, including sufficient detail to enable HMRC to form an accurate view of the affairs of the Company filing the return with an adequate supporting audit trail and sign-off process;
- Paying the appropriate amount of tax at the right time;
- Maintaining tax accounting arrangements which are robust and accurate;
- Ensuring that the departments who are involved in RRD's tax processes are adequately resourced and supported and that key personnel are retained in order to manage tax compliance issues on a knowledgeable and timely basis; and
- Ensuring that all tax filing positions are supported with appropriate documentary evidence.
- Diligent professional care and judgement is employed to assess tax risks in order to arrive at reasoned conclusions on how the risk should be managed. Where there is uncertainty as to the application or interpretation of tax law, appropriate advice will be taken from third party professional advisers with relevant skill and experience to support the decision-making process.

Attitude to tax planning

RRD believes that it should pay the amounts of tax legally due. RRD does not engage in artificial tax arrangements or transactions that lack commercial purpose. RRD will, however, organize its operations in a tax-efficient way and to make use of tax reliefs and incentives in line with UK tax legislation and government policy objectives.

In instances where tax amounts may not be clearly defined, or where alternative approaches may result in differing tax outcomes RRD will use its best judgement in determining the appropriate course of action. On occasions where the tax treatment of a transaction requires a specialist's tax knowledge, the Company will seek appropriate external professional advice and where relevant consult HMRC.

Level of Tax Risks

RRD's strategic aim is to operate within a low tax risk environment. The company's tax affairs are approached and managed in a way which takes into account the wider corporate reputation of the Company in line with the Company's overall high standards of governance.

Relationship with tax authorities

The Company is dedicated to seeking to ensure full compliance with all HMRC statutory requirements.

RRD is committed to the principles of openness and transparency in its approach to dealing with all tax authorities. All dealings with the tax authorities and other relevant bodies will be conducted in a collaborative, courteous and timely manner.

Where there is a view taken by RRD that may potentially differ to a position taken by HMRC, RRD aims to be transparent about the filing position it has taken. The Company strives for early agreement on disputed matters and to achieve certainty whenever possible.

On certain matters, when considered appropriate, the Company will seek to engage external professional advisors to support interactions with tax authorities.

The Company will continue to maintain its current approach of regular meetings and open dialogue with HMRC through the CCM relationship on both routine and non-routine matters.

Date: December 17, 2025