

Fitbit UK Tax Policy 2018

At Fitbit, we recognize that compliance with local and international tax laws and regulations is one of our key responsibilities and we have developed a tax strategy and associated policies which allow us to execute against this core value by reducing risk and driving efficient internal governance of tax matters. The tax strategy conforms to our corporate values and code of business conduct, and is focused on ensuring that (i) tax risks are identified and managed, (ii) all applicable tax laws and regulations are complied with, and (iii) we pay timely all the taxes we are legally required to pay, in every country in which we operate.

In the UK, Fitbit's activities are principally related to the distribution of Fitbit products into the UK market and we pay tax according to these activities. This tax policy applies to Fitbit Limited. It has been published in accordance with Schedule 19 to the Finance Act 2016. This tax policy covers both direct and indirect taxes, including corporate tax, PAYE, VAT and customs duties.

Fitbit Limited has internal governance procedures set at the Fitbit Limited Board and executive level, and by other senior personnel throughout the Fitbit group that have overall responsibility for our tax governance and strategy. Fitbit Limited is supported by an appropriately qualified global tax team which partners with the business to ensure a clear understanding of the tax consequences of any decisions made and transactions entered. We engage with external advisors to provide deep technical expertise and assistance where needed with regards to compliance, reporting, planning, legislative developments, and controversy matters.

We utilize tax reliefs, allowances and other attributes in accordance with UK tax laws and regulations. We adopt a conservative approach in relation to UK tax risk and any tax planning undertaken has regard to commercial and economic substance and the potential impact on shareholders and other stakeholders.

We have open and transparent relationships with the UK tax authorities and build on these relationships through proactive engagement, full disclosure and integrity. We respond to queries and information requests in a diligent manner and seek to resolve any issues in a timely fashion.