

Xilinx – UK Tax Strategy

The publication of this strategy statement is regarded as satisfying the statutory obligations outlined in para. 16(2), Schedule 19 of UK Finance Act 2016.

This strategy statement applies to all Xilinx Group (Xilinx Inc. and all its wholly owned subsidiaries) entities within the charge to UK tax (“Xilinx UK”).

Group Overview

Xilinx Inc. (“Xilinx”, “we” or “the Company”), an entity listed on NASDAQ is the ultimate parent of all companies that form the Xilinx Group. The Xilinx Group is headquartered in San Jose, California, USA, and has operating entities in multiple locations across the globe.

Xilinx undertakes the design, development and marketing of programmable logic solutions. Its product offering includes integrated circuits in the form of PLDs (programmable logic devices), software design tools to program the PLDs, targeted reference designs and intellectual property cores. In addition, Xilinx provides design services, customer training, field engineering and technical support.

More information on Xilinx can be found at <http://investor.xilinx.com/>

Approach to tax risk management and governance arrangements

Xilinx UK’s approach to UK tax is to manage and report all taxes in a manner which ensures full compliance with all tax rules and regulations, and involves disclosing all relevant facts and circumstances to Her Majesty’s Revenue and Customs (“HMRC”) as and when requested and claiming reliefs and incentives where these are legitimately available.

Xilinx’s Code of Conduct sets out the Company’s expectations of how each employee in the global Xilinx Group will comply with the law and Xilinx policies in all business dealings, including tax matters. Compliance with the law and the highest ethical standards are a top priority for Xilinx.

At an executive level overall responsibility for the Group’s tax strategy and management of tax risks rests with our Chief Financial Officer (CFO), with oversight provided by the Audit Committee of the Board of Directors of Xilinx Inc. The day to day management of tax matters rests with the Group Tax Department, with operational support provided by Group Finance.

All Tax Department staff are appropriately trained and experienced, and are expected to stay current on tax developments appropriate to their area of responsibility. We will also seek advice from third party tax advisers on areas of uncertainty or complexity related to tax risk.

The Company’s Internal Audit Department has the responsibility for providing assurance to the Board of Directors of Xilinx that the Company’s tax risk management, governance and controls are operating effectively.

Attitude towards tax planning for UK operations

Any tax planning which Xilinx undertakes is aligned with our commercial business activities and in compliance with UK law and regulations – and consistent with our Company Code of Conduct. Xilinx UK does not engage in any transactions that lack economic substance.

All transactions between Xilinx UK and other Xilinx Group entities are conducted on an arm's length basis, consistent with OECD principles and local tax requirements.

Level of tax risk accepted for UK operations

The level of risk that Xilinx UK accepts is consistent with our overall objective of ensuring compliance with UK laws and regulations, supporting our business needs and being a good corporate citizen. We do not engage in activities that would compromise our Company's strong reputation or that are not consistent with the Xilinx Code of Conduct.

Approach to working with HMRC

Xilinx UK always seeks to maintain an open and constructive relationship with HMRC. We deal with all enquiries in a timely and comprehensive manner, with a view to securing early agreement on any issues of dispute.

Xilinx UK has had a positive record of working with HMRC to resolve past enquiries and audits and we would hope that this approach will continue into the future.