

2022/23 U.K. Tax Strategy

Shopify Inc. and subsidiaries ("Shopify") post this document in order to comply with the United Kingdom (U.K.) [tax strategy publication requirements](#) of Paragraph 19(2) of Schedule 19 to the UK Finance Act 2016.

Shopify is a leading provider of essential internet infrastructure for commerce, offering trusted tools to start, grow, market, and manage a retail business of any size. Shopify makes commerce better for everyone with a platform and services that are engineered for reliability, while delivering a better shopping experience for consumers everywhere.

TAX PHILOSOPHY

Shopify's mission is to make commerce better for everyone. In order to make this mission a reality, our services touch many jurisdictions globally. Shopify's Tax Philosophy supports our mission and the activities of our Tax team adhere to our company [Code of Conduct](#). A key pillar of Shopify's Code of Conduct is to comply with all applicable laws. As such, Shopify's Tax Philosophy is to adhere to the applicable tax laws while carrying out commercial transactions in an efficient manner. Through this approach, Shopify strives to minimize tax uncertainty and adverse outcomes resulting from examination of our income or other tax returns. It is our view that adherence to this philosophy will help support a 100-year company. Shopify is a trusted public company and we conduct our business honestly, ethically and in compliance with all applicable laws.

RISK MANAGEMENT AND GOVERNANCE

Business and operational risks (including tax risks) are disclosed in our Annual Information Form ("AIF"), our financial statements and related notes and the accompanying Management's Discussion and Analysis, which are available on our company [website](#). The risks set out and acknowledged relate to our operations worldwide, including our U.K. operations.

Guided by Shopify's tax philosophy, Shopify reduces uncertainty and tax risks by: hiring and developing a team of qualified tax professionals; engaging U.K. tax practitioners; monitoring and assessing global tax developments; obtaining tax rulings; complying with tax laws and providing regular updates to our leadership.

TAX PLANNING

Shopify's tax professionals support our business by ensuring transactions are carried out in compliance with applicable tax laws and in consideration of evolving tax rules. Our Code of Conduct mandates that we engage in honest and ethical conduct at all times, deal with people fairly and act with integrity. All employees, agents, contractors and Board members of Shopify

are asked to act like owners and acknowledge our responsibility to behave in an ethical manner. We complete the Code of Conduct training and certification annually.

TAXATION RISK TOLERANCE

Shopify takes a prudent approach in determining the level of acceptable tax risk. Certain tax risk factors are beyond our control, some of which are described in our AIF. Where there is uncertainty or complexity in relation to a risk, Shopify has engaged qualified U.K. tax professionals to help ensure that tax risk specific to the U.K. is mitigated and potential changes in law are considered.

APPROACH TO DEALINGS WITH HER MAJESTY'S REVENUE AND CUSTOMS ("HMRC")

Shopify observes relevant tax law, rules and regulations in every jurisdiction where it operates. We engage qualified tax professionals in the U.K. to ensure that all compliance obligations are met. Shopify manages its relationship with the HMRC by adhering to deadlines and remittance obligations and does so with integrity. Shopify responds to requests from tax authorities, including the HMRC in a timely, respectful and comprehensive manner.