ROYALTY PHARMA

2026

Global Tax Policy

Introduction

Royalty Pharma is the largest buyer of biopharmaceutical royalties and a leading funder of innovation across the biopharmaceutical industry. Since our founding in 1996, we have been pioneers in the royalty market, collaborating with innovators from academic institutions, research hospitals and not-for-profits through small and mid-cap biotechnology companies to leading global pharmaceutical companies. We fund innovation in the biopharmaceutical industry both directly and indirectly. We seek to create favorable outcomes for all parties and play an important role in providing capital to the biopharmaceutical ecosystem that supports innovation and positively impacts human health.

Tax Strategy and its Application

Royalty Pharma is committed to conducting its activities in accordance with all applicable laws and with the highest ethical standards. This document outlines Royalty Pharma's global approach to taxation, which applies in the UK and in every country in which Royalty Pharma operates globally.

The overall goal of Royalty Pharma's Global Tax Policy is to support its business by maintaining a sustainable tax rate while complying with all applicable tax law and regulations (including fulfilling any relevant requirements under UK law), and mitigating tax risks in the jurisdictions in which we operate.

Royalty Pharma does not tolerate tax evasion or the facilitation of tax evasion of any kind, in any jurisdiction.

Royalty Pharma's Global Tax Policy applies to all of its entities. This tax strategy and its underlying principles guide the decisions Royalty Pharma makes relating to corporate tax matters. We aim to ensure Royalty Pharma's tax and financial reporting manages risk and promotes stakeholder value.

Tax Risk Management and Governance

Royalty Pharma's tax planning arrangements and transactions, including in relation to intellectual property, are based on its business and investment activities. In structuring our business and activities, our tax team aims to ensure that our business and activities are consistent with relevant tax rules and any applicable regulatory requirements, while at the same time managing tax costs and potential tax risks. Where different options are available, we weigh the impact on our stakeholders and the commercial rationale of the transaction in deciding on the right course of action. Royalty Pharma employs experienced, suitably qualified tax professionals who work closely with our Accounting, Finance, Legal and Human Resources teams at Royalty Pharma. Royalty Pharma has established and maintain robust compliance policies and processes to ensure the integrity of its tax returns, and timely and accurate tax payments in all countries in which we operate. This includes ensuring that training needs for Royalty Pharma’s tax professionals are met in order to manage Royalty Pharma’s tax position appropriately and to provide up to date technical advice in line with their responsibilities.

To supplement the subject matter expertise of Royalty Pharma’s internal tax professionals, Royalty Pharma seeks advice, guidance and specialist input from various experienced external advisors, including accounting firms and law firms in various jurisdictions. Royalty Pharma seek external advice to support its tax function on complex matters and areas of uncertainty, to review the implications on Royalty Pharma of new tax legislation and developments in regulations and guidance, and to provide support with significant transactions. Royalty Pharma also monitors compliance with relevant tax laws,

regulations and guidance, as well as this Global Tax Policy, including maintaining communication and holding periodic meetings with external advisors on developments in tax laws, regulations and guidance.

Royalty Pharma has defined clear lines of responsibility, ensuring that tax-related decisions are taken at an appropriate level. Material tax compliance, risk and related matters are approved and periodically reviewed by the Chief Financial Officer and the Audit Committee of Royalty Pharma's Board of Directors, as well as communicated to Royalty Pharma's independent auditors at least quarterly.

Royalty Pharma also abides by stringent internal controls. Internal controls, including tax-related controls, are updated periodically in light of changes to the general business environment, our business operations, tax laws and regulations (both domestic and international) and emerging tax risks.

Tax Planning

Royalty Pharma undertakes tax planning that aligns with its business activities and reputation as a responsible corporate citizen. This means that commercial factors and requirements lead the business structures, and consequently, Royalty Pharma’s tax approach. Royalty Pharma takes advantage of favorable tax deductions and exemptions, where available and appropriate, as well as relevant bilateral tax treaties aimed at mitigating double taxation. Royalty Pharma strives to ensure that any structures or transactions are implemented to support our strategy, and, as such, all decisions will have a sound commercial rationale, will be compliant with tax laws and regulations, and will be considered in light of any impact such planning could have on Royalty Pharma's reputation. Royalty Pharma seeks appropriate clarification from external advisors and/or governmental authorities, wherever appropriate.

Dealings with Tax Authorities

Royalty Pharma is committed to the principles of openness and transparency in our dealings with tax authorities. In furtherance of these principles, Royalty Pharma:

- Follows established procedures and channels for all dealings with tax authorities, government officials, ministers and other third parties, in a professional, courteous and timely manner;
- Submits tax returns according to statutory time limits, providing complete, accurate returns to all relevant revenue authorities;
- Maintains open, collaborative and professional relationships with tax authorities, resulting in a fair and constructive exchange of information regarding our business and our tax affairs;
- Seeks to resolve issues with tax authorities in a timely manner and, where disagreements or difference of interpretation with tax authorities arise, or where there are misunderstandings of fact or law, works with tax authorities to resolve issues by agreement where possible; and
- Interprets the relevant laws in a reasonable way, and ensures our business structure results in a tax outcome that is consistent with economic reality and complies with relevant tax laws.

Level of Tax Risk Royalty Pharma is Prepared to Accept

While Royalty Pharma is not prescriptive on the level of tax risk it is prepared to accept, Royalty Pharma does not take speculative tax positions and aims for certainty with respect to its tax positions. Where there is material uncertainty on the tax treatment of a transaction or structure, or where the necessary expertise is not available within Royalty Pharma, we evaluate whether our position is more likely than not to be upheld and, where appropriate, ensure that external advice is sought before any position is taken.

Royalty Pharma’s approach to tax risk is inherent within its broader business risk management and compliance framework. Royalty Pharma’s tax professionals (together with external advisors, where appropriate) work alongside the business organization to provide input and manage tax risks in the context of its substantive business transactions, investments and reorganizations. Royalty Pharma’s

processes, policies and governance operate to ensure compliance with tax laws and regulations in the territories where we operate and are designed to help identify and mitigate material tax uncertainty.

Royalty Pharma requires all employees to comply with relevant and applicable laws and regulations and behave in accordance with the Royalty Pharma Code of Business Conduct and Ethics.

UK Law Requirements

This Global Tax Policy has been prepared to comply with the UK legislative requirements under paragraph 16(2) Schedule 19 Finance Act 2016 and sets out our approach to tax in respect of financial year ended 31 December 2026. It applies to the UK and all other countries in which we operate.
This Global Tax Policy was approved by Royalty Pharma's Board of Directors on 15 October 2026.