

United Kingdom (UK) Tax Strategy

OUR APPROACH TO TAX IN THE UK

This tax strategy statement described below is intended to fulfill the statutory requirement in Paragraph 22(2), Schedule 19 of the Finance Act 2016 and applies for the financial year ending December 31, 2018.

INTRODUCTORY SECTION

The Home Depot, Inc. is one of the world's largest home improvement retailers. We offer our customers a wide assortment of building materials, home improvement products, lawn and garden products, and décor products and provide a number of services, including home improvement installation services and tool and equipment rental. The Home Depot has stores located throughout the U.S., including the Commonwealth of Puerto Rico and the territories of the U.S. Virgin Islands and Guam, Canada, and Mexico. The Home Depot has no stores in the UK and only a minimal presence there.

HOW THE HOME DEPOT MANAGES TAX RISKS

The Home Depot's operations are subject to a diverse set of local laws and cultures, including complex tax rules. The Home Depot engages a reputable UK firm to provide tax advice, periodic oversight and tax compliance, ensuring our tax compliance and strategy align with and meet the requirements of UK tax law. The Home Depot is committed to meeting its tax requirements. Our Business Code of Conduct and Ethics requires our directors, officers and associates to comply with our ethical expectations and legal obligations, including applicable local laws.

THE HOME DEPOT'S ATTITUDE TO TAX PLANNING

The Home Depot does not engage in aggressive tax planning or make unreasonable interpretations of tax law. The Home Depot uses the arm's length method of valuation with respect to its intercompany transactions to prevent any economic distortion of the substance of such business transactions. As appropriate, and with the assistance of third-party UK firms, The Home Depot will seek such tax incentives, exemptions and treaty benefits as UK law provides.

THE LEVEL OF TAX RISK THAT THE HOME DEPOT IS PREPARED TO ACCEPT

The Home Depot values its reputation. Our core values, as reflected on our Values Wheel, include doing the right thing and taking care of our people. We live by our values and have a low tolerance for operational or planning tax risks that could damage our reputation or undermine our values. Of course, the size, complexity and geographical footprint of The Home Depot make it inevitable that tax risks will arise. To mitigate these risks, our tax department identifies, evaluates, and monitors tax risks and routinely seeks independent third-party professional advice and assistance in meeting our tax obligations and requirements, consistent with our values.

HOW THE HOME DEPOT WORKS WITH TAX AUTHORITIES

The Home Depot is committed to sustaining an honest, transparent and cooperative relationship with tax authorities. In the event uncertainties or identified risks require communication with Her Majesty's Revenue and Customs (HMRC), we would seek an open dialogue with HMRC. In the case of disputes with HMRC, we would seek to resolve those disputes in a timely manner.

HOME DEPOT (U.K.) LTD. ORGANIZATIONAL STRUCTURE

This tax strategy statement applies to Home Depot (U.K.) Ltd., incorporated within the UK, and its branch operations. Home Depot (U.K.) Ltd. is an indirect subsidiary of The Home Depot, Inc.