

## **Artemis Holdco 1 Limited – Draft Tax Strategy for the year ended 31 December 2023**

This document sets out the tax strategy for Artemis Holdco 1 Limited and its subsidiaries, including Away Resorts Limited, (herein referred to as "the Group") as required by Part 2 Schedule 19 of Finance Act 2016. The document is effective for the year ending 31 December 2023 and will be periodically reviewed and updated. The document outlines the Group's policy and approach to conducting its tax affairs and dealing with tax risk.

The Group's principal objective is the operation of a portfolio of holiday parks in the UK to provide an excellent quality experience for holidaymakers and holiday homeowners. This tax strategy applies to all UK taxes which are required to be reported and paid to HM Revenue and Customs (HMRC), including corporation tax, indirect taxes (including VAT and Stamp Taxes) and employment taxes.

The Group's overall tax strategy is to comply with all the tax statutory requirements in the UK and that it pays all applicable taxes on a timely basis.

### **Management of tax risks**

The Board of Directors have the overall responsibility for management of governance procedures within the Group, supported by an experienced team of departmental heads and senior management across the different business functional areas. The Board of Directors aims to ensure that the Group meets its commercial strategic aims, whilst remaining compliant with its financial and tax statutory obligations.

The Group has a dedicated internal Finance team consisting of experienced professionals who are responsible for the day-to-day management of tax governance, under the supervision and management of the Chief Financial Officer. The Finance team, with relevant support from trusted external advisors, work to ensure that:

- The tax strategy is adopted and adhered to consistently across the Group, with clear lines of responsibility and accountability;
- The tax strategy aligns with the Group's overall approach to corporate governance and risk management; and
- The Group pays the correct amount of tax required under the legislation, at the correct time.

Professional external advisors are engaged by the Group to provide tax support in a number of areas, including supporting the Group with its filing and tax reporting obligations in line with relevant statutory timeframes. The external advisors further support the Group by helping to identify applicable tax regulative changes to ensure the Group's tax governance, controls and processes remain appropriate in line with changes in tax practice and legislation.

### **Attitude to tax planning**

The Group's attitude to tax planning is aligned with its core strategic values and approach to conducting business operations. Whilst the Group aims to maximise returns to shareholders, all Group business decisions are driven by commercial factors and the Group does not participate in any tax planning arrangements that are not consistent with its commercial aims. Tax incentives and reliefs are utilised by the Group where relevant, provided that they align with the Group's commercial aims and the utilisation of such incentives and reliefs is legitimate and compliant with both the letter and the spirit of applicable tax legislation.

The Finance team regularly engage with trusted external professional advisors for support on tax matters arising:

- that are deemed sufficiently complex or material to the Group;
- where there is a significant degree of tax uncertainty;
- where tax guidance is unclear; or

- where there is insufficient expertise or knowledge within the internal team to adequately assess the tax risks and consequences of transactions under consideration.

### **The level of risk the Group is prepared to accept for UK taxation**

Overall, the Group has a low tolerance and appetite for tax risk. The ultimate tax objective of the Group is to comply with all tax legislation, hence, all transactions are based on the Group's commercial strategic values and objectives and are implemented in line with applicable tax legislations. To support this approach, the Group actively engages with trusted external advisors to help identify and mitigate tax risks associated with their business' commercial transactions.

### **Working with HMRC**

The Group aims to ensure that all engagement with HMRC is conducted in a transparent and professional manner.

The Group actively seeks to resolve any instances of tax related issues through agreement with HMRC in a proactive, collaborative and timely manner. In any instances, where there is uncertainty in the Group's tax position, the Group will engage with trusted external advisors to assist with resolving such matters in an efficient manner.

This tax strategy was approved by the Board of Directors of Artemis Holdco 1 Limited on 24 July 2024.