travelfusion

Group Tax Strategy

For the period ended 31 December 2025

Introduction

Travelfusion Limited is an aggregator and global leader in travel content, distribution and payment technologies.

This document sets out the tax strategy of the Group and provides a framework within which the Group manages its tax affairs. The tax strategy is aligned with the Group's culture, commercial objectives and commitment to transparency and trust, and is embedded within the Group's broader financial, risk and governance framework. It reflects the Group's commitment to complying with applicable tax laws and maintaining open and constructive relationships with tax authorities.

This strategy guides tax-related decision-making across the Group and is reviewed at least annually, as well as following significant changes to the business, tax law or the Group's tax risk profile.

Approach to Tax

The Group regards responsible tax management as an important part of its broader financial, risk and governance framework. Its principal tax objectives are as follows:

Governance and Controls: The Group identifies, assesses and manages tax risks through established governance processes, controls and appropriate oversight.

Tax Planning: The Group's tax planning is commercially grounded and aligned with its business activities, economic substance and the purpose of applicable legislation.

Compliance: The Group seeks to pay the right type and amount of tax, comply with applicable tax laws and meet its tax obligations accurately and on a timely basis.

Transfer Pricing and Profit Allocation: The Group seeks to ensure that cross-border transactions and international profit allocation are aligned with the arm's-length principle, economic substance and value creation.

Relationships with Tax Authorities: The Group seeks to maintain open, cooperative and constructive relationships with HM Revenue & Customs and other tax authorities.

Transparency: The Group is committed to transparency in its approach to tax and to meeting applicable public tax transparency and reporting requirements.

Governance and Controls

The Group recognises that tax law can be complex and subject to interpretation. Tax risks are identified, assessed and managed in line with the Group's risk appetite and governance framework.

Material tax matters are subject to established governance processes, with appropriate escalation, review and oversight through management, internal committees, and the Board,

The Board has overall responsibility for the Group's tax strategy. Day-to-day responsibility is delegated to the Chief Financial Officer.

The Group maintains appropriate tax accounting arrangements in accordance with the UK Senior Accounting Officer (SAO) regime.

The Group seeks to maintain appropriate systems, processes and controls to support the accurate and timely calculation, reporting and payment of tax.

Tax Planning

The Group's tax planning is commercially grounded, aligned with its business activities and supported by genuine economic substance. The Group does not undertake contrived or artificial arrangements that lack a clear commercial purpose or are inconsistent with the intent of applicable legislation.

External professional advice may be obtained where tax law is complex, uncertain or subject to interpretation.

Compliance

Compliance means paying the right type and amount of tax in accordance with applicable laws, aligned with the Group's business model, value creation and economic substance.

The Group seeks to engage with HMRC openly and in real time regarding material tax risks, significant transactions and areas of legal or factual uncertainty, disclosing all relevant facts and circumstances.

The Group monitors developments in international tax reform, including the OECD global minimum tax framework, and reflects relevant requirements in its tax governance, compliance and reporting processes.

Transfer Pricing and Profit Allocation

Where cross-border transactions occur within the Group, they are conducted on arm's-length terms using appropriate benchmarks and methodologies.

The Group's transfer pricing outcomes and international profit allocation are aligned with the economic substance of its activities and the value created by the Group entities.

Relationships with Tax Authorities

The Group engages with tax authorities in a cooperative, transparent and proactive manner. It seeks to respond to enquiries in a straightforward and timely manner and to resolve areas of uncertainty through open dialogue. Where there is a difference of interpretation, the Group will seek to explain and may robustly defend well-founded positions.

Transparency

The Group is committed to transparency in relation to its approach to tax planning and compliance, and in its relationships with tax authorities.

This tax strategy is approved, owned and overseen by the Board and is published in accordance with the requirements of Schedule 19 of the UK Finance Act 2016.