

TRAVELFUSION GROUP

TAX STRATEGY

Section 1: Introduction & Overview

Business Strategy and Tax Group Objectives

The Group is committed to comply with all applicable tax laws in the UK and all the countries in which it operates.

It is recognised that taxation matters are often significant in a corporate transaction, and therefore a key objective of our strategy is to ensure that tax affairs of the Group are in good order and uncertainties are minimised.

Risk Management and Risk Appetite

The Group's established ethical framework is such that deliberately failing to comply with tax law is unacceptable.

The Group's appetite towards risk is primarily governed by the aim of retaining our low-risk rating from HMRC. We have a low tolerance to tax risk, and whilst we do not undertake transactions led by a planning purpose, we do as part of our commercial activities consider the tax consequences.

When evaluating a taxation matter, consideration will be given to the level of risk, the ease of implementation and consideration of any tax reliefs or opportunities available to us that are clearly within the legislation and related HMRC guidance.

Tax control environment

The Group maintains internal competence in corporate and transactional taxes to ensure company corporate tax returns are properly prepared and indirect and payroll taxes are properly accounted for and reported, whilst tax guidance and advice is obtained where required from external tax advisors along with tax resources available within the wider Group of companies

Reliance is placed on external advisors for advice relating to tax in the context of commercial transactions, updates and interpretations of tax legislation. Compliance is the responsibility of the business but will be monitored where appropriate by local external tax advisors.

The UK and China teams are responsible for the maintenance of an appropriate tax control framework and a register of tax risks is maintained and updated quarterly to the internal risk management system, which is overseen and reviewed quarterly by the Risk and Compliance function and regularly by the Board.

Section 2: Governance

Strategy Oversight and Sponsorship

The Board is responsible for sponsoring and overseeing the overall Group Tax Strategy. Appropriate accounting and financial oversight is exercised through the Group CFO having oversight responsibility for the Group Board.

**Management Reporting
of Tax Risk**

The Group CFO reports annually to the Board. The Board is provided with a monthly report, prepared by the CFO which provides an update on key issues covering tax and compliance matters.

It is the responsibility of the UK and China Finance teams to ensure all taxation issues are promptly reported to the Group CFO as soon as they become aware of them.

**Relationship with
Revenue Authorities**

The Group maintains open relationships with Revenue Authorities in all countries in which it operates and has a transparent approach to dealing with the relevant Tax Revenue Authorities.

In the UK Travelfusion operates a real-time working relationship with its dedicated customer relationship manager at HMRC with regards to taxation. Travelfusion will raise any matters with HMRC, particularly to avoid uncertainty and for the sake of clarity to ensure compliance at all times.

This tax strategy is published in accordance with paragraph 16(2), Schedule 19 Finance Act 2016