Butlins Skyline Limited

Tax strategy for the year ended 31 December 2026

Scope

Butlins Skyline Limited (Butlin's) is a limited company incorporated in England and Wales and tax resident in the UK.

This strategy applies to Butlin's and the group of companies headed by Butlin's in accordance with the requirement under paragraph 16(2) Schedule 19 Finance Act 2016. The list of entities to which it applies to is as follows:

- Butlins Skyline Limited
- Butlins Development Limited
- Butlins Property (Hotel) Limited
- Butlins Operations Limited
- Butlins Limited

Butlin's is committed to being compliant with all statutory obligations and full disclosure to tax authorities. Tax affairs are managed in a way which takes into account Butlin's wider corporate reputation in line with our overall high standards of operation.

Senior Accounting Officer

The CFO has been appointed the SAO for the Group and holds the responsibility for signing the certification with HMRC.

By meeting the objectives of the Tax Strategy, the SAO is able to provide the annual certification and also act in a proactive manner in relation to the Group's tax affairs, maintaining the Group's reputation as a fair contributor to the UK economy which applies tax rules in good faith and in the spirit they are intended.

The CFO will review the Tax Strategy on an annual basis and recommend any changes to The Board as deemed necessary on each anniversary of its approval.

Group's approach to risk management and governance arrangements in relation to UK taxation

As a UK based, privately-owned company, we are committed to being a responsible business in all aspects and paying the right amount of tax at the right time is a fundamental principle of our operation. The aim is not to avoid or eliminate risk entirely, but to manage closely the Group's exposure to risk.

We are therefore committed to:

• Following all applicable laws and regulations relating to all taxes

• Maintaining an open and honest relationship with the tax authorities

• Ensuring our governance process for managing our tax position is appropriate and robust

Processes relating to different taxes are allocated to appropriate process owners, who carry out a review of activities and processes to identify key risks and mitigating controls in place. These key risks are monitored for business and legislative changes which may impact them and changes to processes or controls are made when required.

The CFO has responsibility for tax at Board level and advises the Board on the tax position and risks of the Group, to ensure:

• The proper control and management of tax risk

• The tax position is managed in line with the Group's strategic objectives

• The tax charge is correctly stated in the statutory accounts and tax returns

The Board has established that the following principles will form the basis of the management philosophy and the tax policy of the Group:

• Good governance

• Strong internal control

• Professionally qualified people

• Applying diligence and professional care in carrying out our tax responsibilities and reporting

Risk Register

The Group has a tax specific risk register designed to identify and monitor tax risk within the Group. The tax risk register is designed to:

• Identify and assess tax risks in a consistent and formal manner;

• Formalise the tax risk management framework;

• Facilitate testing of mitigating controls i.e. monitoring; and

• Provide an escalation framework to the Board.

• The areas of tax risk managed by the Group are subject to on-going review with documentation developed if required. The tax risk register is reviewed annually by all parties involved with tax, prior to signing SAO certification.

• Key stakeholders for each tax regularly monitor the risks identified and recorded in the tax risk register with a plan of action agreed with the CFO to act upon recommendations.

Attitude of the group toward tax planning

In keeping with the Group's approach to risk, the Group does not enter into transactions that have no commercial purpose. The Group aims to structure its commercial transactions in a tax efficient way, taking into consideration all available reliefs and allowances permitted by law.

The level of risk in relation to UK taxation that the group is prepared to accept

The Group's approach to risk is based on reasonable care and materiality and assessment of tax risk is determined by the likelihood of occurrence and the scale of impact.

Given the scale of the business and the range of taxes that the Group has to account for, risks inevitably arise from time to time in relation to the interpretation of tax law and the nature of our compliance arrangements.

Where there is significant uncertainty or complexity, external advice will be sought from leading professional advisors.

Group's policy towards dealings with HMRC

The Group actively supports an open and honest relationship in its dealing with HMRC and will seek to work collaboratively with HMRC in relation to its tax dealings; in particular:

• In the event of any identified error(s) arising, full disclosure, where required by law will be made to HMRC

• The Group will disclose any relevant planning it undertakes to HMRC in line with the legal disclosure requirements and criteria set out by legislation

• The Group will deal with all correspondence in a timely manner

• The Group expects to meet regularly with HMRC to facilitate a mutually beneficial relationship

• When submitting tax computations and returns to HMRC, the Group discloses all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain

16 November 2026