

Butlins Skyline Limited

Tax strategy for the year ended 31 December 2022

This document is produced in accordance with the requirement under Section 161 and paragraph 16(2) Schedule 19 Finance Act 2016 for Butlins Skyline Limited to publish the group's tax strategy.

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

In October 2022 Butlins Skyline Limited was acquired by Zenit Bidco (Jersey) Limited. Until October 2022 Butlins Skyline Limited was part of Bourne Leisure Holdings Limited and reported their tax strategy as part of that Group.

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.

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

The Chief Financial Officer has responsibility for tax at Board level and advises the Board and Audit and Risk Committee 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

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 in 'partnership' 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

December 2022