

Tax Strategy

Parkdean Resorts Group

PARKDEAN RESORTS GROUP TAX STRATEGY

Strategy

- ◆ Applies to all UK entities in the Parkdean Resorts Group – the group headed by Richmond UK Top Holdco Limited (the “Group”).
- ◆ We comply with tax law and practice in the territories in which we operate, exclusively in the UK being our main place of business.
- ◆ Compliance for us means paying the right amount of tax at the right time and involves disclosing all relevant facts and circumstances to the tax authorities and claiming all legitimate reliefs, allowances and incentives where available.
- ◆ Responsibility for the Group Tax Strategy sits with the Board of Directors with Ian Bull as the lead Executive Director.

How we manage our tax risks

- ◆ Risk within day to day transactional processing is managed by the configuration of key systems, process documentation and training of all relevant employees
- ◆ External professional advice is sought as appropriate for complex areas
- ◆ Staff are recruited and trained to have the required business and technical knowledge.
- ◆ The Group Tax Function ensures timely submissions of all returns to HMRC and payment of all taxes.

Our attitude to tax planning

- ◆ Any tax planning undertaken will have commercial and economic substance and will have regard to any potential impact on our reputation and broader goals. We will not undertake tax planning that is contrived or artificial.
- ◆ We regularly utilise tax advisors to assist with ongoing tax compliance in relation to the Group’s core activities and also where one-off transactions raise issues of a complex nature.
- ◆ Tax incentives would only be utilised where these are not considered to carry significant reputational risk or significant risk of damaging our relationship with HMRC.

Our tax risks

- ◆ Given the scale of our business and volume of tax obligations, risks will inevitably arise from time to time in relation to the interpretation of tax law and the nature of our compliance arrangements.
- ◆ We will seek to identify, evaluate, manage and monitor these risks to ensure they remain in line with the Group’s risk appetite. When there is significant uncertainty or complexity in relation to a risk, external advice may be sought (with the Audit Committee approval)

How we work with HMRC

The Group is committed to the principles of openness and transparency in its approach to dealing with HMRC, and in particular the Group commits to:

- ◆ Make fair, accurate and timely disclosure in correspondence and returns, and respond to queries and information requests in a timely fashion.
- ◆ Seek to resolve issues with HMRC in a timely manner, and where disagreements arise work with HMRC to resolve issues by agreement where possible.
- ◆ Interpret the relevant laws in a reasonable way, and ensure transactions are structured consistently. This strategy has been approved by the Audit Committee and the Board of Directors on 22 October 2017.

This strategy applies from the date of publication until it is superseded.

Ian Bull

Chief Financial Officer

22 October 2017