



VILLAGE HOTELS ¹TAX STRATEGY YEAR END 31 DECEMBER 2024

In accordance with FA2016 Sch 19, this document sets out the tax strategy for the UK entities within the Village Hotels group.

Village Hotels is a UK based group which operates wholly within the UK. As such, the vast majority of its internal focus and resource is applied to ensuring the correct tax treatment of its transactions with its customers, suppliers and lenders.

Governance

The Chief Financial Officer (CFO) of the Village Hotels Group is responsible for formulating and implementing our approach to tax. The CFO is also responsible for ensuring that policies and procedures that support the approach are in place, maintained and used consistently around the world, and that the team has the skills and experience to implement the approach appropriately.

Internal governance processes include a framework for reporting key business risks monthly to the Executive Management Team, which include tax risks where appropriate.

Tax compliance is specifically identified as a risk within the Group's corporate risk pillar of its risk control framework, and as such the risk and its management is reviewed by the Core Risk Team at a quarterly risk meeting, as well as by the Senior Risk Committee (comprising CEO, CFO, General Counsel and Director of People and Operations) twice a year. All risks are discussed at Board Meetings with the Main Board.

Operational tax risks identified are included and reported on within the routine internal audit programme, which visits every location unannounced every other year and reports to hotel management, General Counsel and Group Financial Controller as appropriate. Transactional level tax risk is given appropriate focus during the monthly and quarterly preparation of returns for both VAT and employment taxes. Where responsibility for compliance sits across a number of individuals, cross functional business meetings are set up to ensure a cohesive, comprehensive approach.

Management of Tax Risks

We actively seek to evaluate, monitor and manage tax risks to ensure compliance with tax regulations. We retain a number of advisors and legal counsel to provide tax advice and assistance with ongoing tax compliance and tax strategy matters, particularly for areas of tax uncertainty or complexity.

We have implemented procedures and controls designed to ensure our taxation policies are up to date with all international tax regulations, including UK tax legislation. These procedures and controls support the filing of accurate and timely tax returns and paying the right amount of tax in the UK.

We are committed to conducting our tax affairs in a way that is within the letter, spirit and intention of the law. In structuring our business activities, we consider relevant tax laws and utilise available tax reliefs and incentives to maximise value for our investors and stakeholders.

We do not participate in tax avoidance schemes or engage in artificial tax arrangements and we seek to minimise the risk of uncertainty or disputes. We conduct transactions between group companies on an arm's-length basis.

¹ Relay Bidco Limited and its subsidiaries

Working with HMRC

The Group strives to ensure that HMRC considers the business to be Low Risk in its management across all taxes by having a proactive, open and honest dialogue on a real time basis where possible. This includes current, future and past tax risks.

The Business meets HMRC regularly and has an open, cooperative relationship with them, Village Hotels is proud of its low risk rating received following its recent Business Risk Review and is keen to maintain this standard.

Signed on behalf of Village Hotels

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Paul Roberts - CFO & Senior Accounting Officer