Tax Policy

FatFace Group Approach to Tax – Financial Year Ending 30 January 2027

The following publication outlines how the Bridgetown Holdco Limited and all members of the group (FatFace) adhere to the Finance Act 2016 requirements of preparing and publishing their tax strategy.

Our approach to tax

Our approach to tax comprises four key components:

1. FatFace's approach to risk management and governance arrangements in relation to UK taxation

FatFace maintains internal tax operating procedures, including a set of robust controls which are designed to deliver a strong control framework. This is supported by the internal tax team, comprising of the Financial Controller and the Group Finance Manager, who are responsible for the delivery of tax strategy, in keeping with FatFace's Tax Governance and Risk Management Policy.

Three key areas of Board-led tax governance are:

- **Senior Accounting Officer (SAO)**

  The Finance Director has been appointed Senior Accounting Officer for FatFace group of entities. In this role the Finance Director is fully aware of her duty as signatory. The tax team regularly apprises her of any tax risks, the effectiveness of the controls that could impact on the SAO role and any new areas of tax legislation. The tax team assists in determining any areas that need reporting in the current certificates and takes a proactive approach to making HMRC aware of these areas in advance of the SAO certificate being signed.

- **Risk Management**

  Key risks are identified by the interaction of the Tax Team with the supporting departments, consideration by the Core Tax Team, external input through engagement with tax advisers and HMRC and the continued training and development of the Tax Team. Tax risks are assessed on a likelihood and numeric basis, recorded on the tax risk register and escalated to the group risk register in keeping with FatFace's Tax

Governance and Risk Policy. Risks are mitigated by taking appropriate action, for example implementing additional key controls and processes, consideration of potential alternatives with reduced tax risk, use of an external advisor to assist with the management of the tax risk and disclosure or discussion with HMRC. Any risks remaining are escalated and reported based on an assessment of the potential financial impact and likelihood of occurrence. As a minimum, risks are escalated to the Financial Controller and Group Finance Manager for review and ultimately higher rated risks are flagged to the FatFace Board. The above approach is considered to be consistent with a strong level of tax governance.

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2. FatFace's attitude towards tax planning

- FatFace aims to comply with all applicable tax rules and regulations.
- All transactions undertaken by FatFace have a commercial purpose and are not led by artificial tax planning considerations.
- Advice may be sought from external tax advisers to support the tax team in evaluating risk areas, adhering to complex tax laws and implementing best practice.

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3. FatFace's view on the level of risk in relation to UK taxation that the Group is prepared to accept

- FatFace is committed to paying the right amount of tax, in the right place and at the right time.
- FatFace will seek to actively resolve any uncertainty in the interpretation of tax legislation with the relevant tax authority on a timely basis.
- FatFace endeavours to ensure both the integrity of all reported tax numbers and compliance with tax obligations across all Group companies.
- FatFace monitors new tax legislative changes and realigns internal tax processes to remain compliant.
- It is a key goal of FatFace to ensure timely filing of all relevant tax returns and timely payment of all tax liabilities.
- The approach to tax risk governance assists in ensuring that any risks are captured and resolved in a timely, proactive and transparent manner.

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4. FatFace's approach towards its dealings with HMRC

FatFace engages with HMRC constructively, honestly and in a timely and professional manner.

In keeping with this approach FatFace are pro-active in engaging with HMRC on areas of tax risk and keep HMRC up to date of future events with potential tax impact through our regular meetings and conversations.

FatFace seeks to resolve disputed matters through active and transparent engagement.

Note: FatFace regards this publication as complying with the duty under paragraph 16(2), Schedule 19 Finance Act 2016.