

## Tax Strategy Policy – Financial Year Ending 30 September 2022

### Purpose

Elior UK is dedicated to creating long term shareholder value, through the achievement of our key objectives, development of our business and continuing to invest in future growth.

### Scope

Our tax strategy is designed to support these aims whilst balancing the needs of all stakeholders including government, colleagues, customers and the industries in which we conduct our business.

The key components below form the basis of our tax strategy:

#### Compliance and tax authority relationship

Elior UK aims to observe all applicable laws, regulations, disclosure requirements and deadlines for submission of returns and payments of tax due. We maintain constructive working relationships with the tax authorities and are committed to open and transparent dialogue in all communications. In an increasingly complex tax landscape, we proactively assess new legislation and ensure that appropriate procedures and controls are in place to ensure compliance.

#### Tax reporting and systems

Elior UK is committed to reporting financial performance and tax impacts with the maximum possible transparency, whilst ensuring that our competitiveness is not compromised. Underpinning this commitment is ensuring that our systems can record and collate tax data accurately and on a timely basis, plus making the best use of system-based internal controls. We are compliant with HMRC initiatives in reporting taxes and returns digitally and continue to develop our systems in this regard.

#### Risk management and uncertainty

Given the scale and nature of our business, a degree of risk and uncertainty is inevitable in relation to the interpretation of tax law and compliance. We proactively seek to manage these risks and, where significant uncertainty or complexity arises, we seek appropriate advice from external professional firms. Risks or judgements of a material nature are considered by the Elior UK Leadership team who will determine the appropriate course of action.

Elior UK is committed to observing the Criminal Finances Act 2017. Elior UK shall ensure that it has in place all processes and procedures necessary to limit the risk of representatives of the business criminally facilitating tax evasion including risk assessment, proportional procedures, top level commitment, due diligence, communication and training and monitoring and review.

### Governance

Elior UK's approach to tax strategy is set at the highest levels, by the Elior UK Leadership Team, who take responsibility for ensuring that sufficient and appropriate resources are available for the effective and proactive management of taxation. Elior UK's detailed Tax Management Policy, from which our summarised tax strategy is determined, is approved by the Board of Directors and will be reviewed annually.



**Catherine Roe**  
Chief Executive, Elior UK  
14 December 2021