

## gategroup tax strategy

This document outlines the most important aspects of the Tax Strategy for gategroup and especially the gategroup UK entities. This document is prepared and published to comply with the obligations under paragraph 16(2) of Schedule 19 of the UK Finance Act 2016 to publish a tax strategy. It is effective for the year ending 31 December 2021.

### GATEGROUP TAX MISSION STATEMENT

*gategroup's tax strategy is based on the Group's values and code of conduct and aims to comply with all applicable rules, regulations and compliance obligations. It is gategroup's intention to pay the right amount of taxes under given laws and as required in the countries where the Group is liable to taxation.*

### CODE OF CONDUCT - GATEGROUP'S ETHICAL COMPASS

The Code of Conduct shall ensure that gategroup conducts the business in an honest, ethical and lawful manner. It outlines the behaviors and ways of working that gategroup members must commit to and encourage it to its colleagues.

Based on gategroups' Code of Conduct, gategroup and its UK entities comply with both local and international laws. gategroup has several policies in place to assist in understanding the obligations and ensuring compliance with the laws. gategroup's employees have a personal responsibility to understand and comply with all applicable laws, rules, regulations and company policies.

### TAX RISK MANGEMENT AND GOVERNANCE

gategroup's reputation and its financial credibility would be damaged by significant, unexpected tax adjustments. Tax Risks are properly controlled and managed. Gategroup has a global process in place to manage significant tax matters in order that they are identified, assessed, managed and monitored. This governance includes responsibility by our UK finance team with oversight by the Group Tax Function that reports to the Chief Financial Officer.

Working closely with Group Controlling, Group Accounting, Group Risk Management, the Internal Audit and the respective business divisions, gategroup's Group Tax Function works continuously on improving the processes and relationships that provide the early warnings and required checkpoints for a robust tax risk control environment.

In addition to this, gategroup maintains a "State of the Art" financial process and respective ERP systems worldwide.

The group seeks to ensure that local tax fillings are undertaken in compliance with all relevant laws and that its transfer pricing methodology is accurate. Its transfer pricing methodology is set up in accordance with the Organisation for Economic Cooperation and Development ("OECD") transfer pricing guidelines.

gategroup is monitoring closely any potential changes in taxes (direct and indirect taxes) which can have an impact on the tax position in UK and worldwide.

Moreover, gategroup works closely with reputable tax advisors to ensure compliance with key laws and requirements.

#### TAX PLANNING

- gategroup and its affiliates envisage possibilities within given boundaries of laws, regulations and practices and most importantly ethics.
- gategroup is taking a conservative approach when it comes to tax planning.
- gategroup seeks to minimise risks of dispute and thus aims to have simple and clear structures in place that are supported by clear business needs.

#### RELATIONSHIP WITH TAX AUTHORITIES especially the HMRC

- gategroup UK entities aim to have a timely, open and collaborative dialogue with HMRC.
- gategroup UK entities aim to keep the HMRC informed about business developments and its impact on the relevant tax position where necessary.
- gategroup UK entities ask for clarifications of areas of concern in cases where interpretations of tax laws are uncertain.