

Naked Wines PLC - UK Tax Strategy  
March 2024

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This document sets out the Tax Strategy of Naked Wines Plc (the “Company”) and its UK subsidiary undertakings (together the “Group”) for the Financial Year 2023-2024 and confirms that this policy was also applied in previous fiscal periods since its first definition and publication. Naked Wines Plc is making this strategy available as part of good governance as it is not classified as an HMRC Large business and is not bound by the obligations under Schedule 19 of the Finance Act 2016.

This document was originally approved by the Board in February 2019 and with latest revisions approved by the Audit Committee in March 2024. The strategy will be reviewed in each financial year with any amends approved by the Audit Committee.

1) The Group's approach to risk management and governance

The Board takes compliance with tax regulations seriously and is responsible for ensuring that the Group’s governance achieves this, while remaining efficient.

The Group Chief Financial Officer is responsible for keeping the Board of Directors of the Company (the “Board”) apprised of material tax decisions or events, allowing all Board members and the Group Audit Committee to be adequately engaged in the Group’s tax affairs. The senior finance team are responsible for the day to day implementation of the tax strategy and management of the day to day tax affairs of the Group, as well as highlighting any changes in local tax regulation

The Group maintains a global code of conduct and control standards. Each business units’ performance against the control standards is tested annually with the results and any required action plans being reviewed by the Audit Committee Board sub committee. These reviews seek, *inter alia*, to confirm that all relevant taxes have been paid on a timely basis, which provides the Board additional insight into the management of tax affairs by each business unit.

External advice is sought on any substantive tax decision, as well as in ensuring ongoing accuracy and compliance with all relevant standards in our tax submissions.

2) The Group's attitude towards UK tax planning

The Group is a responsible taxpayer that typically only accepts a low level of tax risk. We recognize that tax is, by its very nature, complex and often uncertain.

The Group does not participate in aggressive tax planning. As an international Group which supports its overseas subsidiaries from the UK we have documented intercompany recharge procedures that are commercially motivated and reflect the underlying economic substance of our business. To ensure these are consistent with internationally accepted



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benchmarks, our intercompany trading arrangements were developed with external expert advice to support the Group's decision-making process.

- 3) The level of risk in relation to UK taxation that the Group is prepared to accept Domestically, as a collector of substantial revenues on behalf of HMRC in the form of VAT, duty and payroll taxes as well as having liability for corporation taxes the Group is committed to ensuring it submits all returns and payments to HMRC in a timely manner. The Group has a low tolerance for tax risk and is committed to full compliance with tax obligations, paying the right amount of tax at the right time. The Group seeks to ensure that its tax arrangements remain consistent with a low risk assessment, both in financial and reputational terms.

The Group uses expert external advice and support to ensure that all filing positions are appropriate and supported by any necessary documentation. To support this the Group maintains robust and accurate accounting arrangements supported by an internal assurance function.

- 4) The Group's approach towards dealings 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 is committed to:

- Making fair, accurate and timely disclosure in correspondence and returns and responding to queries and information requests in a timely fashion.
- Seeking to resolve issues with HMRC in a timely manner and, where disagreements arise, work with HMRC to resolve issues by agreement where possible.
- Being open and transparent about decision-making, governance and tax planning.
- Ensuring all interactions with HMRC are conducted in an open, collaborative and professional manner



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