

FRASERS GROUP PLC TAX STRATEGY

Frasers Group plc (“**FG plc**”), its subsidiaries and associated companies (the “**Group**”) is the UK’s largest sporting goods retailer by revenue and aspires to build the planet’s most admired and compelling brand ecosystem by offering our customers an unrivalled range of high quality leading brands.

The Group’s overall strategy is to invest in our people and our key third party brand partners in order to elevate our retail proposition to attain new levels of excellence across our multi-brand, multi-channel offering to customers.

This document, which relates to the financial period ending on 30 April 2024, has been published pursuant to Schedule 19 of the Finance Act 2016 and sets out our approach to managing the Group’s tax arrangements.

Risk Management and Governance Arrangements

The Group’s CFO is designated as the Senior Accounting Officer for the Group and has principal day-to-day oversight of the Group’s tax arrangements. The CFO presents a tax update to the Audit Committee of the Board of Directors of FG plc on a regular basis. The Group’s tax risks are monitored, directed and ultimately overseen by the Board of Directors of FG plc.

The Group has an established and dedicated in-house tax team who are responsible for various aspects including Corporate Tax, Employment Taxes, VAT, Customs and Duties and hold the appropriate knowledge and professional qualifications required to successfully carry out their roles and responsibilities.

The Group has documented processes for its tax arrangements and aims to ensure that all tax payments are correct and made by the relevant due date. The documented processes identify areas of potential tax risk and put controls in place to mitigate those risks. These processes are reviewed on a regular basis. Our Internal Audit function also plays a key role in independently monitoring and testing our controls in relation to tax and reports to the Audit Committee on their effectiveness.

The identified risks cover an array of taxes and arise from factors such as the:

1. geographical diversity of markets in which the Group operates;
2. complexity of the Group’s supply chain;
3. Group’s reliance upon IT systems with regard to its day-to-day operations; and
4. integration of acquired businesses.

View on Level of Risk

The Group has a prudent tax risk appetite and low tax risk tolerance. It is committed to paying the correct amount of tax at the right time and in the right place. These views on tax risk are influenced by the Group’s stakeholders (which include, without limitation, its shareholders, senior management and employees). The Group is therefore particularly concerned that these values are communicated and recognised.

In pursuance of this, the Group ensures that all departments involved in the processes and controls relevant to the management of taxation employ appropriate numbers of professionally qualified

employees. We monitor new tax legislative changes and amend internal process where necessary to ensure we are compliant with our tax obligations across all Group companies. When tax risks are identified, the Group Head of Tax will liaise as required with the business to monitor and manage the relevant risk.

The Group regularly consults with its appointed professional tax advisors and the relevant tax authorities, in particular in respect of tax return filings, tax payments and complex or contentious issues.

Attitude to Tax Planning

The Group aims to be a responsible and compliant taxpayer and adopts a conservative approach to tax matters.

The Group is a significant contributor and collector of taxes primarily in the UK but also worldwide.

The Group will consider opportunities to structure its arrangements in a tax efficient manner such as the use of legitimate tax incentives. Such arrangements are for commercial purposes and are carefully evaluated by the Group whilst ensuring compliance with all relevant tax legislation.

The Group may seek advice from external tax advisors to support the in-house tax function in evaluating risk areas, adhering to complex tax legislation and implementing best practice.

Working with HMRC

The Group is committed to working with HMRC in a constructive and timely manner.

Regular contact is made with our Customer Compliance Manager at HMRC by our Group Head of Tax on at least a 2-monthly basis but, outside of this, to update HMRC on significant transactions or changes in the business and to seek advice where necessary in respect of any tax issues.

Tax returns submitted to HMRC are supported by appropriate audit documentation.

The Group aims to avoid unnecessary tax disputes with HMRC. It proactively looks to engage with HMRC on, amongst other things, tax risks, and seeks advance tax clearances on potentially uncertain tax positions as appropriate.