

## **Golf Holdings Limited Taxation Strategy**

**June 2024**

This document, approved by the board of Golf Holdings Ltd, sets out the Group's approach to conducting its tax affairs and dealing with tax risks.

The Group is committed to: -

- Maintaining an open and transparent relationship with the tax authorities based on collaboration and integrity.
- Following all applicable laws and regulations relating to its tax activities.
- Applying due diligence and care in our management of the processes and procedures by which all tax related activities are undertaken and ensuring that our tax governance is appropriate.

### **Approach to risk management**

The Group operates with effective tax governance, ensuring that tax risks are appropriately managed and that senior personnel with the appropriate skill and experiences are involved in taking key tax decisions.

Where there is uncertainty over the tax treatment in any aspect of the business or there are any changes to legislation, external professional tax advisers provide the necessary advice and guidance to properly assess tax risks and ensure compliance to applicable laws, rules and regulations, as well as full reporting and disclosure requirements.

The Group wants to ensure that it pays an appropriate amount of tax in relation to its commercial activities. It does not engage in aggressive tax planning arrangements, and believes that it is conservative in its approach to tax planning, applying tax rules and regulations in a way that it considers is consistent with parliament's intention, and HMRC expectations.

### **Attitude towards tax planning and level of risk**

The Group is made up of UK businesses and all taxes are paid in the U.K.

The Group's tax planning aims to support the commercial needs of the business by ensuring that the Group's affairs are carried out in the most tax efficient manner whilst remaining compliant with all relevant laws. While utilising the advantage of relevant tax reliefs, incentives and exemptions, the Group shows respect for the spirit of the law, as well as the letter, at all times.

The finance function is involved in commercial decision-making processes and provides appropriate input into business proposals to ensure a clear understanding of the tax consequences of any decisions made. In cases where the tax guidance is unclear or the Group does not feel it has the necessary expert knowledge to assess the tax consequences adequately, external advice may be sought to support the Group's decision-making process.

## **Relationship with HMRC**

We are committed to working in a collaborative, transparent and constructive way with HMRC at all times. We communicate regularly with our Customs Relationship Manager to discuss all areas of tax and seek advice in cases of uncertainty or doubt.

We adopt the principles of openness and transparency in our approach to dealing with HMRC. This involves in engaging proactively with open and early dialogue with HMRC to discuss the Group's tax affairs.

The Group is committed to making fair, accurate and timely disclosure in correspondence and returns, and respond to queries raised by HMRC in a timely manner with the aim to resolve any issues in real-time where possible or to work together to resolve issues quickly and efficiently, with certainty wherever possible.

**Kevin Reid**

**Senior Accounting Officer**