



**Banijay  
Group**

# **GROUP TAX STRATEGY**

Adopted by the Board of Directors on 15 May 2024

*15 May 2024*

# INTRODUCTION

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Banijay Group complies with tax laws and practices in all the territories in which the Group operates.

Compliance for Banijay Group and its subsidiaries (the “**Group**”) means paying the right amount of tax, at the right place, at the right time. It also means that the Group claims for identified tax reliefs and incentives where available.

For each legal entity and in line with the decentralized model of the Group, local management is responsible for ensuring that proper tax compliance is in place.

The tax strategy applies to all types of taxes at every jurisdiction level (local, regional, and national) (the “**Tax Strategy**”). The Tax Strategy is reviewed annually by the Group Tax Director and Group CFO before being approved by the Board of Directors.

# TAX STRATEGY

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- 01.** Tax Planning
- 02.** Tax Risk Management
- 03.** Intragroup transactions
- 04.** Relationships with tax authorities
- 05.** Disclosure

# 01.

## Tax Planning

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- 1.1. In structuring the Group commercial activities, the Group will consider the tax laws of the countries within which the Group operates in order to make the most efficient use of permitted tax reliefs and other incentives as well as using carry forward tax losses.
- 1.2. At the same time, any tax planning undertaken will have a commercial rationale and economic substance.

# 02.

## Tax Risk Management

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- 2.1 Given the size of the Group's business and the volume of tax obligations, risks will inevitably arise from time to time, in relation with the applicable laws.
- 2.2 The Group will actively seek to identify, evaluate, manage, and monitor these risks to ensure they remain in line with the Group's objectives.
- 2.3 In case of significant uncertainty or complexity in relation to a potential risk, the Group will seek expert advice.

# 03.

## Intragroup transactions

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- 3.1 Transactions between Group companies are carried out in accordance with the Group interpretation of tax laws, tax treaties, OECD's guidelines and agreements entered with foreign tax authorities.
- 3.2 Transactions between Group companies are normally concluded at arm's length.

## 04.

# Relationships with tax authorities

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- 4.1 The Group engages with tax authorities with honesty, integrity, and transparency to maintain a constructive relationship wherever possible.
- 4.2 The Group recognizes that there might be areas of differing legal interpretations with the tax authorities at times. Where this occurs, the Group will engage in proactive discussions to resolve any such issues as quickly as possible.

## 05.

# Disclosure

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This Tax Strategy is publicly available on Banijay Group website in order to allow external stakeholders to understand the Group's approach to tax and to comply with the UK Finance Act 2016, Part 2, Schedule 19, as well as other disclosure requirements effective in the countries where the group operates.