

## **bet365 Group Tax Strategy**

The bet365 Group ("the Group") comprises the gambling business along with Stoke City Football Club.

The Group pays a wide range of taxes, levies and duties in multiple jurisdictions. The taxes paid by the Group include corporate income taxes, betting and gaming levies/duties along with employment taxes and indirect taxes such as VAT.

The Group recognises the importance of its tax contribution to the relevant government finances together with its wider corporate responsibility, and through its low risk Tax Strategy ensures timely and accurate tax compliance, payment and reporting.

The Group's Tax Strategy is approved by the Group Board and the Group regards the publication of this strategy as fulfilling the requirements of Finance Act 2016, Schedule 19, Paragraph 16(2).

### **Risk Management and Governance**

The Group, via its robust financial, reporting and management information systems operates a highly monitored control environment. The Group has a nominated UK Senior Accounting Officer who together with fellow Directors and in-house Finance, Legal and Tax teams, ensures that the Group has complete accounting policies and procedures in place to allow the Group to establish and maintain appropriate tax accounting arrangements to ensure that tax liabilities are accurately calculated and paid.

The Group's Board has ultimate responsibility for the Group's Tax Strategy with day to day responsibility for the Group's tax affairs sitting with the Tax Director and Senior Accounting Officer. The in-house team of tax and finance professionals monitor and manage tax risk on a real time basis and report to the Operational Boards and the Group Board on an ongoing basis.

There are robust tax policies and compliance processes in place to ensure the accuracy of the Group's tax returns and the timely payment of taxes which fall due. The tax risk management process involves the proactive identification, evaluation, control and monitoring of tax risk.

### **Attitude to tax planning**

The Group does not engage in any transactions lacking in commercial substance or contrary to the intention of relevant legislators in order to obtain a tax benefit. The Group's tax outputs are created purely as a result of the commercial operations of the Group's gambling and football club business, and the Group actively aims to ensure compliance with the relevant international and domestic tax legislation and guidelines. The Group will seek external professional advice where necessary to ensure tax positions taken by the Group are accurate and appropriate.

### **Engaging with HMRC**

The Group is committed to maintaining a transparent and collaborative relationship with all tax authorities, including Her Majesty's Revenue and Customs ("HMRC"). There is ongoing dialogue with all relevant tax authorities to ensure that the business is better understood and that tax risk is managed and controlled.

**The level of risk the Group is prepared to accept**

The Group is focussed on a low risk Tax Strategy, has a low tolerance to tax risk and only engages in low tax risk behaviours. This low risk approach is applied consistently across all the Group's betting and gaming subsidiaries and the football club.

Approved by bet365 Group Board of Directors.

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