

Saga plc – Tax Strategy Policy

Approved by the Board of Directors of Saga plc on 19 May 2022

This Tax Strategy applies to Saga plc and all UK entities in its UK group in respect of the financial year ended 31 January 2022.

Saga plc Group Tax Strategy

As a responsible business which intends to have a positive impact on society, our customers and our colleagues, we are committed to paying the right amount of tax at the right time. We are committed to treating our customers and colleagues fairly and to properly assessing the tax impact of any transactions on our customers and colleagues.

We will seek to structure commercial transactions in the most efficient and legitimate way. We will not support proposals to reduce our tax cost using artificial structures.

We will work to ensure that our Tax Strategy is aligned with Saga's core values and supports Saga's strategic business objectives.

Saga's tax arrangements

All active UK trading entities within the Saga Group pay taxes in the UK. This includes corporation tax (including Tonnage Tax), indirect taxes (VAT, IPT and excise duties) and employment taxes, and it is our aim to comply with all relevant laws, rules and regulations and all reporting and disclosure requirements.

The Saga Group has non-UK companies in Guernsey and Germany, and we comply with local tax legislation and all transfer pricing requirements.

Our relationship with HMRC

We keep HMRC informed of all significant business developments and seek agreements and clearances as appropriate. We work with HMRC to resolve issues relating to current, future or past taxes.

Where appropriate, we will contribute views and information, and input into the process to help shape tax legislation in areas of potential change or policy uncertainty.

How we manage our business's tax risks

We are committed to paying the right amount of tax at the right time and we have no appetite for incurring material penalties or interest payments.

We maintain a register of Saga's tax risks and ensure we have a robust framework of effective controls to continuously identify, assess and manage those tax risks.

Our Tax function collaborates with Saga's business units and is actively involved in all key commercial and operational transactions, providing advice and guidance to maintain compliance. The business involves the Tax function in all material projects. We ensure the Tax function has appropriate understanding of Saga's businesses and products to provide support, and to draw conclusions based on the facts and risks involved.

We obtain advice from external advisers with the appropriate experience in areas where tax law is complex or new, is outside the experience of our Tax function, or where the treatment may be uncertain and the amount of tax involved is material. We also use these services where business demands exceed the capacity of the internal team.

Governance

Saga's CFO has overall responsibility for management of the tax affairs of the Group and is supported by the Tax function. The CFO has authority to approve any tax matter except for tax litigation which must be approved by the Board. Litigation will only be considered for recommendation to the Board if there is a robust and sound technical basis.

We operate a three lines of defence model for managing tax risks. The first line is delivered by our trading businesses which operates tax compliance processes, in part supported by certain shared service functions covering payroll and accounts payable. The second line is provided by the Tax function and the CFO, who provide oversight and support and maintain the relationship with HMRC. The third line assurance is delivered by Internal Audit and other external providers from time-to-time.

Board ownership

This strategy is aligned with all our codes of practice and operation and is approved, owned and overseen by the Board of Saga plc. The CFO does and will continue to report to the Board on tax matters that impact the business, highlighting risks, mitigation strategies and opportunities.

Saga plc and UK group companies consider this publication complies with paragraph 16(2) and paragraph 25(1) of Schedule 19 of the Finance Act 2016.

Approval

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