



Inside Ideas Group Tax Strategy and Tax Risk Management Policy

Introduction

This Tax Strategy document applies to Inside Ideas Group Limited and its UK and non-UK subsidiaries ("the Group")

The purpose of this document is to communicate the tax management policy for the Group and ensure consistent and compliant tax practices are applied when conducting tax affairs and dealing with tax risk.

This document will be reviewed periodically by the Group and approved annually by the Global Leadership Team (GLT) to ensure it remains relevant and an accurate reflection of the Group's policies and practices. This document is available on the Group's website.

Key Summary of this Policy

- The Group complies with all relevant tax laws and regulations.
- We will supply complete and accurate information to tax authorities, and we will act truthfully and cooperatively with tax authorities.
- The Group's employees are accountable for compliance with this policy.
- For any major business change, including transactions, systems, and processes, we will seek to understand the tax implications and reflect these accurately in the accounting records in accordance with applicable rules.

Approach to tax risk compliance and risk management

The Group aims to be a trusted and respected business partner in the marketing industry. Tax compliance is a critical element of this ambition.

We understand and support that collecting and paying tax is an important contribution to the economies and societies in which our business operates.

Tax can have a significant cash and profit impact on our business, and it is important to ensure that consistent and effective tax standards are maintained across the Group to enable us to maximise shareholder value in a fiscally compliant manner.

Through the operation of appropriate risks registers reviewed by Group Tax and Global Finance Teams, and the adoption of an appropriate policy in relation to anti-facilitation of tax evasion we seek to ensure that all stakeholders are kept aware of the importance placed on tax compliance.

Strategy and Policy Scope

For the purposes of this strategy and policy, tax is defined as all financial charges or levies (direct and indirect), including corporate taxes (e.g., CT, WHT, CGT), indirect taxes (e.g. VAT, GST, Sales tax), social security contributions (e.g. National Insurance) and payroll withholding taxes (e.g. PAYE), duties (e.g. alcohol, import, export and stamp duty) or similar and other taxes applied by any tax authority in any relevant jurisdiction.

Our principles and policy

We are committed to doing the right thing in everything we do. With respect to tax, this means that the Group will:

- pay tax in accordance with all relevant laws and regulations.



- comply fully with all relevant tax laws and regulations in all the countries in which it operates;
- maintain an open and honest relationship with tax authorities; and
- conduct its tax affairs on sound commercial business principles.

It is not our role to determine the “fair” amount of tax to pay. It is our obligation to report and pay the correct amount of tax due, in accordance with rules set by the governments in the jurisdictions in which we operate. The GLT has determined that we have a ‘low’ risk appetite in the area of tax, and we will endeavour to implement the necessary policies, processes and controls to maintain our risk within this appetite.

Our policy has 5 key principles:

1. We will comply with all relevant laws, rules, regulations and reporting and disclosure requirements.
2. The Group tax strategy and the execution of this will be consistent with the Group’s risk management strategy, including the Group’s appetite for, and approach to, risk and the Group’s core values.
3. All business will be conducted on sound commercial principles and, in doing so, will take account of all relevant costs, including tax, such that any transactions undertaken are executed in a tax compliant and efficient manner.
4. We have implemented and will maintain robust governance processes and compliance monitoring to ensure confidence in our ability to make complete and accurate tax submissions and the timely payment of all appropriate amounts of tax.
5. We will pursue open, constructive and transparent working relationships with all tax authorities.

Governance

The Board has ultimate accountability for tax compliance and tax strategy. However, operational accountability and risk management is delegated to the GLT. As such:

- The GLT approves the Group’s tax policy annually as part of the ongoing review of the Group’s overall Risk Management framework.
- The GLT delegates authority for the execution of this policy framework to the Group Head of Tax.
- Operational decisions will be taken at an appropriate level determined by the formal Inside Ideas Group Delegation of Authority.
- The GLT comprise relevant members of the senior management and have key roles in the monitoring and reporting against both the Group’s risk management framework and Delegation of Authority.
- The Group Head of Tax retains ownership of the Group’s tax operations and oversight of tax risk, with the detailed analysis and preparation of the tax records carried out by the Group’s financial teams.

Risk Management

Effective risk management sits at the heart of our business strategy and is core to our system of governance and compliance. The aim is not to avoid or eliminate risk, but to manage closely the Group’s risk exposure and maintain this within the Group’s risk appetite as determined by the Board and aligned to our strategic and corporate objectives.



The Group's ongoing tax risk approach is based on principles of reasonable care and materiality. Significant tax risks are evaluated based on a balance of impact of that risk and its likelihood of occurrence. The global finance teams employ various risk management processes and procedures to provide assurance that the requirements of the Group tax policy are being met. This will include compliance monitoring, internal audit reviews and consultation with our specialist tax advisors.

Tax planning

The proactive and timely communication of business transactions is critical for effective tax management. Identification of tax risks at the planning stage of a transaction will ensure that the tax risk is managed effectively. All major capital projects and change initiatives with a tax impact are approved by the Chief Financial Officer (CFO) and Group Head of Tax.

All papers put forward to the GLT that contain comments on tax must be supported by an appropriate level of tax analysis. This analysis must be sufficient for the GLT to understand the tax risks and to evaluate whether the tax risks presented by the adoption of any particular tax planning opportunity are acceptable.

Specifically, the GLT will have reference to:

- **Commercial purpose:** All transactions must have a commercial purpose and be supported by appropriate cost benefit analysis.
- **Reputation impact:** Any tax planning should have a minimal impact in the event that details were to be in the public domain.
- **Strength of tax advisers' opinion:** Appropriate external advice will be obtained, as necessary. The Group will undertake appropriate training or consult experts to ensure we understand the relevant tax laws and regulations. Where the Group instructs an external organisation to perform tax services on its behalf, it will act in accordance with the principles set out in this policy so that it is able to discharge its obligations in a manner that is consistent with this policy.

Control Processes

Key controls to manage the risk of incorrect tax accounting and tax payments exist and the fulfilment of these is documented in the various tax workings papers for the Group's tax returns. Operational ownership of these controls sits with the Group Head of Tax. These processes and control documentation are subject to a program of ongoing review and improvement.

Monitoring and Reporting

There are three steps to ensure our tax compliance process is followed:

1. **Execution of tax processes by suitably trained and experienced individuals:** Satisfactory completion of core tax processes and the timely, accurate submission of all tax payments will be approved and documented by the CFO, Group Head of Tax or delegated to the local finance team, as operationally required.
2. **Senior Management review:** All tax reporting deadlines and tax matters that have to be disclosed to a Tax Authority are monitored by Group tax. The Group Head of Tax will report on an exception basis to the GLT on all control issues at every Audit and Risk Committee meeting.
3. **Finance Team Administration:** The global finance teams and Group Tax Team are responsible for review of the business process and control environment of the Group. They will seek guidance from relevant domestic tax advisors and experts. All processes are agreed with



the Group Head of Tax. The Group Head of Tax will assess the need for a review of the Group's tax environment as part of global finance teams' planning.

The Group is independently audited annually, and tax accounting is audited in accordance with this process.

A plan of action will be agreed with the Group CFO and the Group Head of Tax as applicable to act upon recommendations made by these reviews and audits within a timeframe which is appropriate to the Group's risk management objectives and resource allocations.

Relationship with the Tax Authorities

The Group strives to maintain a transparent, timely and honest relationship in all its dealings with all tax authorities and will seek to work in a collaborative, professional and courteous manner at all times.

Senior management will, specifically:

- Engage in full, open and early dialogue with Tax authorities to discuss tax planning, strategy, risk and significant transactions.
- Make fair, accurate and timely disclosure in correspondence and returns, including the identification of any errors, and respond to queries and information requests in a timely manner.
- Interpret the laws in a reasonable way and ensure transactions are structured consistently within a cooperative relationship.
- Continue to meet and cooperate with Tax authorities to facilitate a mutually beneficial relationship.

APPENDIX A: DOCUMENT CONTROL

Date	Version	Author(s)	Changes
Feb 2021	0.1	Rob Marks	New Document
Nov 2021	0.2	Rob Marks	Updated to complete.
Sep 2022	0.3	Kara Iselin	Legal Review
Nov 2022	1.0	IIGL Board	Board Approval