

### INTRODUCTION

A&K Travel Group's, ('AKTG's) culture is founded in our history and our values. AKTG comprises Abercrombie & Kent and Crystal and our vision for tax is that we should always conduct ourselves and our business ethically, honestly and in compliance with the letter and spirit of all applicable laws in respect of all taxes. We uphold this vision by following the below strategic objectives.

**We are committed to principles of good tax governance, with a sound and effective system of risk management and controls**

The Board of Directors of AKTG has overall responsibility for our system of risk management and internal controls in relation to taxation, reviewing its effectiveness to ensure adequate policies and controls are in place. AKTG's approach to tax is agreed and approved by the Board and is reviewed regularly and updated on a periodic basis.

The Global Tax team updates the Board on a timely basis as regards relevant legislative changes and any significant tax risks that result from business operations and transactions and how to minimise and manage those risks to acceptable levels. The Board sets organisation-wide risk tolerance levels for tax as low.

The Global Tax team is resourced with appropriately qualified and experienced personnel, complemented by the use of external tax advisers where specialist advice is required, so as to allow AKTG to manage tax risk and compliance effectively across jurisdictions in an ever-changing and complex global tax environment. The Global Tax team works closely with management and is responsible for the monitoring and testing of controls and processes within our internal control framework, to develop, evolve and maintain our tax risk governance framework. In addition to regular communication with the Board, the Global Tax team actively seeks to engage with business, finance, other support functions and management across AKTG's jurisdictions to foster a collaborative working relationship.



**We create shareholder value and manage our tax affairs in an efficient manner, upholding our principles of performing our duties with integrity and fairness, considering the contribution to our societies**

In alignment with our Standards Of Business Conduct policy, AKTG believes in a principled approach to its tax affairs. We endeavour to pay the right amount of tax at the right time and meet our compliance obligations in each of the jurisdictions in which we operate. We manage our total tax liability within the framework of legislative reliefs and incentives available. Business transactions are undertaken to support commercial drivers and business growth. To this end, we may consider the most tax efficient way to conduct such transactions, while respecting and complying with international standards and local tax laws.

**We seek mutually beneficial long-term relationships with our stakeholders, including tax authorities**

Our relationships with stakeholders are based on fair, respectful and trustworthy practices. AKTG communicates with HMRC and other tax authorities in an open and honest way, taking a proactive approach to engage with them where considered appropriate. We engage with external advisers and tax authorities where tax legislation is open to interpretation and, in the event of a dispute, seek to resolve it as quickly and collaboratively as possible.

**Approved by the Board of Directors**

This tax strategy is published in April 2025 by A&K Travel Group Holdings Ltd in compliance with UK legislation under paragraph 19(2) of Schedule 19 of Finance Act 2016 in respect of the Financial Year ended 31 December 2025. This strategy is applicable to all AKTG entities.

This Tax Policy will be reviewed periodically to ensure its effectiveness and compliance with changes in tax legislation. AKTG will conduct internal audits of its tax processes to ensure that tax compliance is maintained and to identify and mitigate any potential risks.

