

## Travel Counsellors approach to tax

Travel Counsellors connects a global community of travel consumers with expert, caring travel advisors, who specialise in creating travel experiences that put customer needs first and champion the human touch. The company provides the tools and technology platform that supports over 2,000 corporate and leisure Travel Counsellor business owners to provide highly personal, bespoke travel experiences to customers and corporate clients.

This tax strategy document sets out our approach to tax for our UK companies within the group. We regard this publication as complying with our duty to publish a tax strategy for the year ended 31 October 2025, under paragraph 16 (2), schedule 19, Finance Act 2016. The document has been approved by the board of directors for the period ended 31 October 2025 and will be periodically reviewed and updated where appropriate.

The Group's approach to tax matters is to comply with all relevant tax laws and regulations, wherever we operate in the world. It is the Head Office team's responsibility to ensure compliance with local tax legislation, and advice is sought from external advisors where there are areas of uncertainty. Where there may be differing legal interpretations between the Group and local tax authorities, we aim to always communicate and engage with authorities in a timely manner.

The Executive Board sets the overall strategic risk and risk management principles, while the Chief Financial Officer is ultimately responsible and accountable for the implementation of the group's tax strategy to ensure these are aligned with these principles.

The Head Office team, overseen by the Chief Financial Officer, is responsible for implementation and management of appropriate tax processes and policies to govern tax compliance on a day-to-day basis, with support from professional advisors where appropriate. Any material tax uncertainties are reported to the Board.

We are committed to a continuation of our low-risk approach to tax, which includes avoiding the implementation of any tax instruments that are aggressive, artificial, or lacking commercial substance. We seek to maintain an open, collaborative and honest relationship with HMRC and local tax authorities elsewhere.

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