

TAX STRATEGY

CHIME GROUP HOLDINGS LIMITED

YEAR ENDED 31 DECEMBER 2018

This Tax Strategy applies to the Chime Group – all companies, both UK and overseas, the results of which are consolidated into the Chime Group Holdings Limited statutory accounts. This Strategy is published in accordance with Schedule 19 of the Finance Act 2016 and has been approved by the Board of Directors. It will be reviewed annually by the Head of Tax and any amendments approved by the Chime Group Board prior to publication, thus ensuring that the rapidly changing tax landscape is reflected through the evolution of our Strategy.

This document sets out the Group’s policy and approach to conducting its tax affairs and to dealing with tax risk. The Chime Group Board has ultimate responsibility for tax governance and management, with day-to-day responsibility being delegated to the Head of Tax and wider tax team.

Chime is a global communications and sports marketing group which aims to transform businesses through sport, entertainment and communications by creating lasting commercial and social impact. The group provides expertise in sports & entertainment and communications offerings, including event management & activation, consultancy, athlete representation, advertising & marketing services and insight & engagement.

INTERACTION BETWEEN THE GROUP’S BUSINESS ACTIVITIES AND ITS MANAGEMENT AND ATTITUDE TO TAX RISK

Our business activities generate substantial amounts of tax, which form a significant part of our economic contribution to the countries in which we operate. The Chime Group is committed to complying with all applicable tax laws and having transparent, collaborative real-time relationships with the tax authorities of all jurisdictions in which the Group operates.

In addition to our Tax Strategy and wider Governance policies, a key part of tax risk management is ensuring that the appropriate team is engaged with all of our processes – whether business as usual, or in the context of specific transactions. In order to achieve this, the Head of Tax has established a tax team, comprising members from each of the divisions, to facilitate effective business partnering and ensure that

- i. this Tax Strategy is adopted and followed consistently across the Group;
- ii. there is alignment of the Tax Strategy with the Group’s overall approach to corporate governance; and
- iii. the Chime Group pays the appropriate amount of tax at the appropriate times, in all the jurisdictions in which it operates

The Head of Tax is part of the central finance function that reports to the Group Finance Director. The Head of Tax has appropriate professional qualifications and experience commensurate with the responsibilities required for the role. Chime is committed to developing the Group Tax team and providing members with training as required to facilitate performance of their roles.

All finance personnel employed by the Group are responsible for complying with the principles and strategy set out in this document and with wider tax governance requirements. We are also committed to providing training to non-tax personnel in key areas including HR and finance to ensure that they are able to inform the tax team of relevant developments, and to make decisions with tax consequences in the best interests of the Group and in line with this strategy.

The Group adopts a straightforward attitude to tax risk, whereby we will only file on a basis which we consider to be technically robust and fully supported by the facts of the situation. We will seek to obtain all readily available reliefs in order to maximise shareholder value, but do not engage in the deliberate adoption of overly aggressive stances with regard to transfer pricing, structuring or undertake transactions that would be considered artificial.

ATTITUDE TO TAX PLANNING

While all our commercial activities must give the appropriate regard to maximizing shareholder value, the tax laws of the countries in which the Chime Group operates are always carefully considered when determining business structures. Consideration is also given to the Group's reputation, brand, and corporate and social responsibility, and the associated consequences of any tax planning.

Where alternative choices exist to achieve the same commercial result, the most tax effective approach (as supported by the economic reality and substance of our activities, and in compliance with all relevant laws) is likely to be taken. We will always strive to fulfill our primary objective of paying the appropriate amount of tax at the right time and maintaining our strong reputation with tax authorities.

With the assistance of reputable advisors (where sufficiently specialist knowledge is not available in-house), we form strong tax technical positions based on a full understanding of the business, commercial and regulatory context of transactions prior to agreeing on a course of action. Where appropriate, advance clearance may be sought from tax authorities to ensure that the Group's position is technically sound and in line with market practice.

WORKING WITH TAX AUTHORITIES

We take our relationships with HMRC, and the tax authorities of all the Chime jurisdictions as seriously as our client relationships. We engage, on a regular basis, with tax authorities and are pro-active in informing them about our business activities and transactions as required. We acknowledge that there may on occasion be instances where the Group does not agree with HMRC or other tax authorities on the interpretation of law, but we will always seek to negotiate these issues without damaging the wider relationship.