

Allwyn Group

GROUP TAX STRATEGY

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I. Approach to tax (GRI 207-1)

At Allwyn Group, we align our tax practices with our corporate values of doing what is right. This tax strategy outlines our approach to managing tax risks.

Responsible gaming sits at the heart of our company's strategy. Our lotteries operate under the European Lotteries and World Lottery Association responsible gaming standards.

The Allwyn Group recognizes the critical importance of adhering to tax regulations. By diligently paying its due taxes, the Group not only fulfils its legal obligations but also reinforces its commitment to responsible corporate citizenship in line with our ESG Strategy.

We emphasize corporate responsibility and view the proper administration and payment of taxes as a crucial part of our business and means to contribute to the economies where we operate. We strive to maintain a good standing with regulatory bodies and foster a trustworthy relationship with our stakeholders, including our customers.

We have established the following tax principles to ensure a consistent approach to tax matters within the Group:

1. **Compliance with tax regulations.** We are committed to applying lawful tax practices in line with the applicable national and international legislations and maintaining transparency with tax authorities and stakeholders.
2. **Effective tax risk management.** We prioritize identifying and assessing tax risks proactively in line with the tax risk management framework.
3. **Commitment to responsible tax practices.** We are committed to being compliant, cooperative, and paying taxes in each country where we operate and to foster trust and credibility with our stakeholders and the wider community.
4. **Sound organizational set-up.** Local finance teams cooperate with the Group tax team, enabling cohesive and effective tax oversight and the application of consistent tax principles across the Group.
5. **Tax procedures aligned with the law.** We ensure that all tax procedures are backed by genuine commercial reasons, reinforcing our integrity and long-term credibility.
6. **Continuous improvement of tax processes (e.g., through digital solutions).** This approach increases efficiency and ensures compliance with evolving tax regulations.
7. **Arm's length basis.** Transactions with related parties are undertaken on an arm's length basis in compliance with the Organisation for Economic Cooperation and Development (OECD) and relevant legislation.

Governance and review

The Head of Tax is responsible for ensuring the propriety, effectiveness, and proportionality of the tax risk management framework, and setting the tax strategy. The Chief Financial Officer provides oversight over the management of tax risks across the Group, ensuring accurate, comprehensive, and timely risk information and data. This oversight supports effective decision making and helps achieve the desired risk profile. The Group Tax Strategy is reviewed annually and signed off by the Audit Committee.

Regulatory compliance

We engage in tax procedures only if they are consistent with the Group's conduct and ethics standards. When entering into commercial transactions, we seek to take advantage of available tax incentives, reliefs and exemptions in line with tax legislation.

In our business activities, we consider tax law and transfer pricing guidelines. Transactions between our subsidiaries are conducted on an arm's length basis in compliance with relevant legislation as well as international guidance and best practice, such as those set out by the OECD. We do not carry out business in any tax haven jurisdictions as defined in the EU [list](#) of non-cooperative jurisdictions.

Tax and sustainable development

The United Nations Sustainable Development Goals (UN SDGs) are a set of 17 global goals designed to be a blueprint to achieve a better and more sustainable future for all with the goal of balancing the economic, social and ecological dimensions of sustainable development. Taxes are a critical financial resource to help reach these goals.

We recognize the importance of tax in advancing local and global economic development and are committed to contributing to the communities where we operate. Additionally, we acknowledge that tax transparency is a key pillar of good governance, fostering trust with stakeholders and enabling long-term value creation.

Our tax strategy aligns with our broader sustainability and ESG commitments by ensuring transparency, compliance, and responsible tax practices that support long-term value creation for all our stakeholders.

Our tax practices ensure that we contribute to public finances in the communities where we operate, supporting the UN Sustainable Development Goals ([SDG](#)) 5, 8, 12, 13, and 16.

II. Tax governance, control and risk management (GRI 207-2)

Tax governance and control framework

Financial controls are updated periodically to mitigate risk. The Head of Tax and CFO communicate tax compliance and risk matters to the Audit Committee.

We have robust compliance processes in place to ensure the completeness of our tax returns, as well as the timeliness and accuracy of our tax payments. These measures are designed to minimise compliance risks and uphold our commitment to regulatory compliance.

Tax risk management

Our approach to tax is deeply embedded within the organization through several key actions and activities that align with our broader corporate values and governance practices. We maintain a low-risk appetite in relation to tax matters, underscoring our commitment to compliance and transparency.

We provide regular training and guidance to relevant employees, emphasizing the connection between tax strategy and business strategy. This ongoing education ensures that employees understand the integral role of tax strategy in achieving our overall business objectives.

We have pledged to communicate with all stakeholders in a trustworthy and transparent manner in compliance with our [Code of Conduct](#). We encourage our employees to speak up and report any possible misconduct they believe violates our [Code of Conduct](#), any laws, regulations, regulatory orders or any internal rules via dedicated webpage (<https://report.whistleb.com/en/allwyn>).

III. Stakeholder engagement and management of concerns related to tax (GRI 207-3)

We aim to maintain professional relationships with the tax authorities based on mutual respect and trust. We engage proactively and constructively with the tax authorities and seek rulings to reduce the risk of disputes.

Where this is not possible and/or appropriate we rely amongst others on external professional advice from reputable advisors. Whilst we aim to resolve disputes in a constructive manner by working with the tax authorities, we will defend positions that we believe are in line with the law.

We are a member of the European Lotteries (“[EL](#)”) and/or World Lottery Association (“[WLA](#)”). Additionally, we participate in tax regulation discussions in the countries where we operate. This involvement fosters a transparent and continuous exchange also on tax-related matters with a diverse range of stakeholders.

The Group Risk Management function reports regularly to the Group Executive Committee, Group Audit Committee and Group Board. Tax risk falls within the perimeter of the taxonomy.

Tax risk inputs and datapoints are quantitatively aggregated and consolidated to determine the Group risk profile and to identify areas of excessive risk concentration/exposure. Regular communication and meetings between the group and operating level risk management teams, are organized to observe the effectiveness and progress of mitigation plans, enhance risk awareness and knowledge, discuss opportunities and share emerging risks perspectives.