

moonpig

Tax Strategy April 2020



Tax Strategy

Moonpig* is the world's largest online personalised greeting cards retailer and a leading European retailer of flowers and gifts.

This statement sets out Moonpig's tax strategy for the financial year to 30 April 2020. It represents the framework within which Moonpig conducts its tax affairs, setting out its commitment to comply with tax laws and to ensure an open relationship with tax authorities.

This statement also fulfils Moonpig's duty to publish a tax strategy under Schedule 19 of the Finance Act 2016.

This legislation requires Moonpig to set out its approach and attitude on a number of areas concerning UK taxation and its relationship with the UK tax authorities. Accordingly, this strategy focuses on Moonpig's tax policy and its dealings with HMRC. Wherever possible, Moonpig applies the same principles and conduct to its dealings with overseas tax authorities.

This statement has been approved by the Board of Directors of Moonpig** and is published on 31 March 2020.

* This statement applies to the UK companies that form part of the Moonpig Group, namely Moonpig.com Limited, Cards Holdco Limited and Sticky9 Limited (referred to collectively in this document as "Moonpig").

** This statement has been approved by the Board of Directors of Horizon Holdco Limited (which is Moonpig's ultimate holding company) and by the Board of Directors of Cards Holdco Limited (which is the holding company of the Moonpig Group).



Tax Governance

Moonpig's Board of Directors* has overall responsibility for tax policy and tax governance. Whenever significant decisions impacting tax liability or tax risk have to be taken, they are brought to the attention of the Board.

The Chief Financial Officer of Moonpig is the Board member with executive responsibility for tax matters. Day-to-day management of tax affairs resides with the Director of Financial Control. Together, these individuals work with the wider finance team, and with all business functions, to ensure high quality controls and processes around tax.

Moonpig coordinates closely with Photobox** (an operationally-separate business that is under common control) to ensure consistency of approach in tax strategy.

External tax specialists are used where appropriate to assist with non-UK filings, to advise on individual transactions or projects, and to provide clarification on legislative changes as required.

* The Board of Directors of Horizon Holdco Limited, which is Moonpig's ultimate holding company.

** This Tax Strategy applies only to the UK companies of Moonpig (namely, Cards Holdco Limited, Moonpig.com Limited and Sticky9 Limited). Photobox Group (comprising Photobox Limited and all other UK companies that are within the group headed by Horizon Holdco Limited but outside of Moonpig) has prepared a separate tax strategy that will be published on www.photobox.co.uk.





Approach to Managing Tax Affairs

Moonpig's strategy is to create long-term, sustainable shareholder value by becoming a gifting companion to its customers. As part of this strategy, Moonpig is committed to complying with all applicable laws, regulations and stakeholder expectations in the jurisdictions where it is present.

Moonpig's approach to managing its tax affairs is one of responsible compliance. The business strives to fully understand the tax laws and practices of the countries within which it operates; and it seeks to pay and report appropriate levels of taxes.

Moonpig aims to structure its business activities such that they are based on commercial and economic substance. Moonpig does not undertake planning that creates abusive results or wholly artificial arrangements.

Where there is material uncertainty in relation to the tax treatment of a transaction, Moonpig seeks advice from external tax advisers and acts accordingly.

Moonpig claims government-approved incentives, reliefs and exemptions to the extent they are both available and commercially applicable.

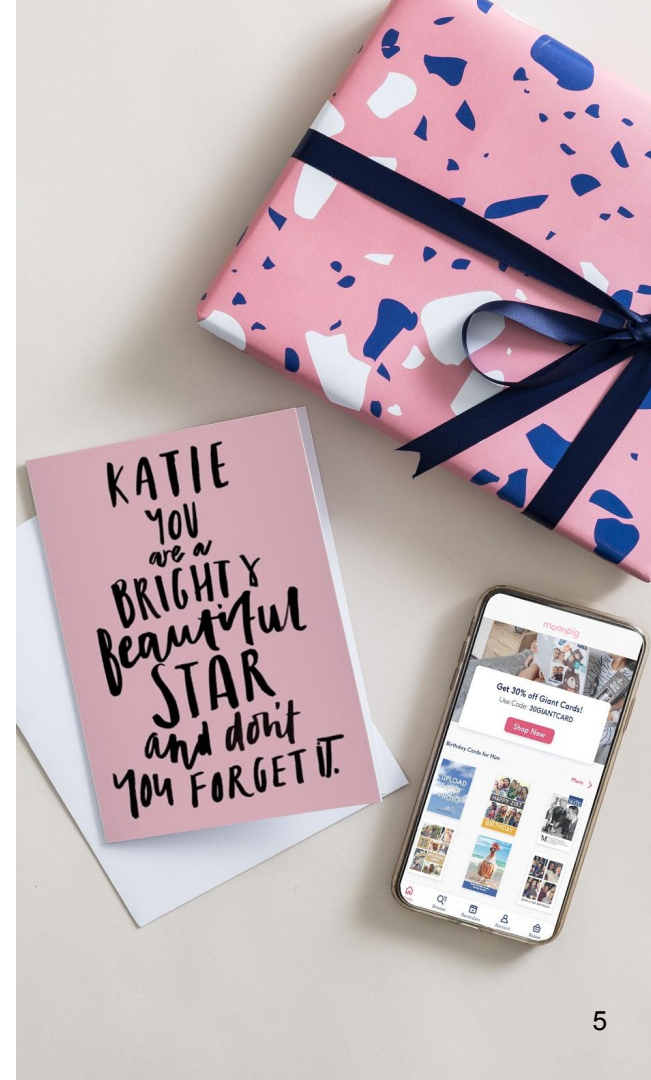
Attitude to Tax Risk

Moonpig's attitude to tax risk is one of low tolerance.

It is impossible in practice to reduce tax risk to zero, for instance because of uncertainties in tax legislation and the increasing complexity of the international tax environment.

However, Moonpig aims to minimize the risks which give rise to tax uncertainty by:

- Compliance with tax laws, practice and guidance, through robust internal systems, procedures and controls.
- Seeking to continuously improve its tax compliance capability.
- Making reasonable interpretations of tax legislation which are in the spirit of the law.
- Pursuing a relationship of co-operation with tax authorities where possible.





Relationships with Tax Authorities

Moonpig seeks to have a relationship with all tax authorities that is based on good faith and transparency.

In the UK, Moonpig aims to have an open dialogue with HMRC in respect of developments in its business, interpretation of the law and any current, future or retrospective tax risks.