Bard Midco Limited
Tax Strategy
Year ending 31 December 2026

Introduction

This Tax Strategy is published in accordance with Schedule 19 of the Finance Act 2016 for Bard Midco Limited and its subsidiaries (the 'Group') for the year ending 31 December 2026. Bard New Topco Limited, a Company incorporated in Jersey, is the ultimate parent undertaking of Bard Midco Limited.

The tax matters described in this strategy primarily relate to the activities of Haven Leisure Limited and its subsidiaries, which undertake the Group's principal operating activities. It sets out the framework through which the Group manages its tax affairs and describes its approach to tax governance, risk management, tax planning, tax risk and engagement with HMRC.

Tax Governance and Risk Management

The Board has ultimate responsibility for the Group's Tax Strategy and has oversight of tax risk. Responsibility for implementing the strategy is delegated to the Chief Financial Officer, while day-to-day responsibility for managing the Group's tax affairs is delegated to the Head of Tax. The Head of Tax is responsible for managing the Group's tax affairs, monitoring tax risks and legislative developments, overseeing compliance obligations and obtaining external advice where appropriate. Significant tax matters are reported to the Chief Financial Officer and, where appropriate, escalated to the Board.

The Group maintains processes and controls designed to support compliance with its tax obligations, including its Senior Accounting Officer obligations.

Tax risks are identified, assessed and monitored as part of the Group's wider risk management framework. The Tax Risk Register is reviewed at least twice a year and updated to reflect significant developments, transactions and legislative changes.

The Group is supported by experienced finance and tax professionals and engages external advisers where specialist support or independent advice is required. The Group does not use its statutory auditor, Ernst & Young LLP, for tax advisory services.

Tax Planning

The Group's approach to tax is aligned with its commercial activities and the genuine economic substance of its business operations. The Group seeks to pay the correct amount of tax required under applicable law and does not undertake tax planning that is artificial or lacks commercial purpose. Tax considerations form part of commercial decision-making, but do not override wider commercial, operational, legal or reputational considerations. The

Group may claim tax reliefs and exemptions where these are available and intended by legislation.

Tax Risk Appetite and Uncertain Tax Positions

The Group adopts a low-risk approach to its tax affairs. Tax decisions are made within the governance framework described in this strategy and are assessed against the Group's tax risk appetite. The Group seeks to ensure that tax positions are based on a reasonable interpretation of applicable tax law and reflect the underlying commercial substance of relevant transactions.

Where the application of tax legislation involves uncertainty or requires judgement, the Group seeks to establish and document an appropriate technical basis for the treatment adopted and may obtain external advice where appropriate.

The Group does not enter arrangements that could be considered aggressive, artificial or inconsistent with the intention of the law. In assessing tax risk, the Group considers technical tax risk, financial exposure, compliance obligations and reputational impact.

Relationship with HMRC

The Group seeks to maintain an open, transparent and constructive relationship with HMRC. As a large business within HMRC's Large Business Service, the Group works with its Customer Compliance Manager to discuss significant matters and resolve issues in a timely and transparent manner. The Group seeks to comply fully with its filing and payment obligations, engage with HMRC on a timely basis, provide information required by law and address areas of uncertainty proactively.

Where material transactions or significant uncertainties arise, the Group may seek advance clearance or engage with HMRC at an early stage to obtain greater certainty over the appropriate tax treatment. The Group seeks to resolve disputes through constructive engagement wherever possible.

Review

This Tax Strategy is reviewed annually by the Head of Tax, the Chief Financial Officer, and the Board to ensure that it remains appropriate to the Group's business activities, organisational structure, risk profile and the applicable tax framework.