



Charlotte Tilbury

Tax Strategy

For the Financial Year Ended
31 December 2022



Charlotte Tilbury

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1. Introduction

Charlotte Tilbury Limited and its subsidiaries are a privately held group of companies ("**Group**"), headquartered in London, United Kingdom ("**UK**"). The Group was acquired by Prado Investment Limited (which comprises of Puig SL and BDT Capital) on the 23 June 2020. The Group's principal activity is the development and sale of beauty, fragrance and skincare products. The Group has subsidiaries across the UK, Europe, North America and Asia Pacific markets and delivers retail sales through its' own stores, B&M retailers, specialty retailers, pure players, franchise partners and online channels.

2. Charlotte Tilbury's UK Tax Strategy Overview

In accordance with Schedule 19 of the Finance Act 2016, this UK Tax Strategy ("**Tax Strategy**") is applicable to all Group entities registered and/or resident in the UK ("**Charlotte Tilbury UK**"). To guide behaviour and decision-making relating to fiscal matters for Charlotte Tilbury UK, this Tax Strategy is intended to establish the governance framework, principles, values, guidelines, and standards for the Group relating to tax.

This Tax Strategy applies to all direct taxes, indirect taxes and taxes on employment income, capital gains and real estate income, local taxes, duties and other tax obligations as defined in paragraph 15 (1) of Schedule 19 of the Finance Act 2016. Charlotte Tilbury UK is fully dedicated to complying with all fiscal regulations applicable in the UK, as well as to all information disclosure obligations that exist with the tax authorities in the UK, Her Majesty's Revenue and Customs, ("**HMRC**").

This 2021 Tax Strategy has been approved by The Board of Directors of Charlotte Tilbury UK, being published on the website, in accordance with Section 161 and paragraph 19(4) of the Finance Act 2016 and will be reviewed on an annual basis.

Charlotte Tilbury UK will review the principles and practices contained in this Tax Strategy periodically, and the Strategy will be modified as required, to be in compliance with applicable fiscal and other regulations. The tax environment is ever evolving, and Charlotte Tilbury UK will always strive for continuous improvement.

3. Charlotte Tilbury's UK Tax Strategy

3.1. Foundation and Purpose

The purpose of the Charlotte Tilbury Tax Strategy is to support the Finance Organisation and partners across the business, by actively collaborating to drive the correct tax compliance, and solutions to mitigate tax risks. The foundation of this Tax Strategy focuses on the following core principles.



The Tax Strategy aims to ensure compliance with the applicable tax regulations in the UK and the appropriate coordination to support the long-term business strategy of Charlotte Tilbury UK, with a focus of mitigating tax risks and inefficiencies in operations, and in the execution of business decisions.

Charlotte Tilbury UK is committed to respecting each territory in which it operates. Charlotte Tilbury UK is aware of its corporate social responsibility and carbon footprint. The taxes paid by the Group contribute to the maintenance of the public sectors and therefore, one of the Group's contributions to society. Charlotte Tilbury UK is a cruelty free brand, and this has always been a cornerstone value of the company.

The policies and the values which underlie this Tax Strategy are supported by and aligned with the principles on which Charlotte Tilbury UK is built.

3.2. Tax Risk Management and Governance

Charlotte Tilbury UK takes a conservative approach to tax risk, and it seeks to manage its tax risk through strong practices and controls. Charlotte Tilbury UK collaborated with an external tax provider to scrutinise and improve the tax controls in place. These controls will be reviewed annually to ensure the processes in place are robust and can adequately support the fast-paced growth of the Group.

Charlotte Tilbury UK has a dedicated and qualified tax function who manage the Group's tax matters in the UK and globally. The tax function is also responsible for the Tax Strategy and tax governance of the Group. The tax function is competently supported by the Director of Finance and Chief Operating & Financial Officer. The tax function is responsible for all tax heads, with the exception of taxes related to employees, which is managed and controlled by the People Function.

The tax function is responsible for the approach to tax on a day-to-day basis which includes the tax compliance, identification, prioritisation, and monitoring of tax risk across the business, as well as the escalation of tax risk. These responsibilities, expand to all the countries and territories in which the Group is present.

3.3. Tax Planning

The Group understands that taxes paid in the UK contribute significantly to the progress and development of this community. Additionally, with this Tax Strategy, the Group aims to create value for its shareholders, customers, employees and for other stakeholders in a sustainable manner. For this reason, transactions will always be carried out for business reasons in accordance with applicable regulations and take account of the possible impact of fiscal decisions in the UK.

In respect of tax planning, the Group has a low-risk appetite and aims to ensure that tax decisions are aligned to commercial strategy and company values. Charlotte Tilbury UK, avails of tax incentives and exemptions where appropriate and in a way that is consistent with legislative provisions and HMRC guidance. The nature of the Group's activities mean that Charlotte Tilbury UK avails of certain incentives focused on Research and Development.

The Group ensures that all tax obligations are met and seeks to ensure the correct tax is paid at the right time in the right territory. For cross-border matters, the tax function follows the double tax treaties and relevant OECD guidelines, especially for transfer pricing and taxable presence in jurisdictions.

In circumstances where doubt arises, Charlotte Tilbury UK shall seek external tax advice from one of its tax advisors in respect of tax planning activities.

3.4. Relationship with Authorities

Charlotte Tilbury UK works collaboratively, respectfully, and transparently with HMRC. In the event minor errors are identified, Charlotte Tilbury UK strives to maintain an open honest relationship with HMRC, to ensure that these are rectified as soon as is reasonably possible.

Charlotte Tilbury UK ensures that tax returns will be filed in a proper and timely manner as per regulations in the UK, taxes payable will be duly paid and tax incentives provided by local regulations will be applied in line with the activities carried out by Charlotte Tilbury UK.

Charlotte Tilbury UK will seek to fully cooperate with any HMRC inspections. Charlotte Tilbury UK will acknowledge any inspection in a clear, precise and complete manner. In addition, Charlotte Tilbury UK will keep up to date with HMRC guidance and changes in the tax environment.