



Group Tax Strategy

Published August 2023

CF Bacchus HoldCo Ltd and its subsidiary undertakings (together the “Group” or “Majestic”) are proud to be the UK’s largest specialist wine retailer operating over 200 stores in the UK with over 1,000 employees. As a responsible UK business, our objective is to pay the right amount of tax at the right time to meet our statutory obligations.

This Strategy sets out the framework and management of the tax affairs associated with the Group’s activities and applies for the Financial Year ending 3 April 2023. CF Bacchus HoldCo Limited is making this strategy available to fulfil its obligations under Schedule 19 of the Finance Act 2016.

This document was approved by the Board on 16 August 2023 and will be reviewed each financial year with any amends approved by the Board of Directors.

1) The Group's approach to risk management and governance

The Board takes compliance with tax regulations seriously and is responsible for ensuring that the Group’s governance achieves this, while remaining efficient.

The Group Chief Financial Officer, is responsible for keeping the board of directors of the Group (the “Board”) appraised of material tax decisions or events, allowing all Board members to be adequately engaged in the group’s tax affairs.

The senior finance team are responsible for the day to day implementation of the tax strategy and management of the day to day tax affairs of the Group, as well as identifying any changes in local tax regulation. The senior finance team actively seek to identify, evaluate, monitor, and manage the tax risks with the Group.

The Group maintains a global code of conduct and control standards. Each business units’ performance against the standard is tested annually by the Group Controls Function; with the results and any required action plans being reviewed by the Board. These reviews seek to confirm that all relevant taxes have been paid on a timely basis, which provides the Board additional insight into the management of tax affairs by each business unit.

Appropriate training is carried out for staff who manage or process tax matters. However, it is recognised that tax is, by its very nature complex and at times uncertain, and therefore external advice is sought on any substantive tax decision, as well as in ensuring ongoing accuracy and compliance with all relevant standards in our tax submissions. Where external advice is obtained, all returns, submissions and tax implications of relevant transactions are reviewed internally before completion.

2) The Group's attitude towards UK tax planning

The Group is a responsible taxpayer that only accepts a low level of tax risk. Consistent with our business goal of creating shareholder value by “Doing the Right Thing”, the Group does not participate in aggressive tax planning and only undertakes transactions which are commercially driven. As an international Group which supports its overseas subsidiaries



from the UK we have documented intercompany trading procedures that are commercially motivated and reflect the underlying economic substance of our business.

We will claim tax reliefs, incentives and allowances where these are available in the manner in which it was intended by the relevant tax authorities and legislation.

3) The level of risk in relation to UK taxation that the Group is prepared to accept

Domestically, as a collector of substantial revenues on behalf of HMRC in the form of VAT, duty and payroll taxes as well as paying substantial corporation taxes, the Group is committed to ensuring it submits all returns and payments to HMRC in a timely manner.

The Group has a low tolerance for tax risk and is committed to full compliance with tax obligations, paying the right amount of tax at the right time. The Group seek to ensure that its tax arrangements remain consistent with a low risk assessment, both in financial and reputational terms.

The Group uses expert external advice and support to ensure that all filing positions are appropriate and supported by any necessary documentation.

To support this the Group maintains robust and accurate accounting arrangements in compliance with the Senior Accounting Officer (SAO) arrangements in the UK.

4) Relationship with Tax Authorities

The Group is committed to the principles of openness and transparency in its approach to dealing with HMRC and, in particular, the Group is committed to:

- Making fair, accurate and timely disclosure in correspondence and returns and respond to queries and information requests in a timely fashion.
- Seeking to resolve issues with HMRC in a timely manner and, where disagreements arise, work with HMRC to resolve issues by agreement where possible.
- Being open and transparent about decision-making, governance and tax planning.
- Ensuring all interactions with HMRC are conducted in an open, collaborative and professional manner

Date: 16 August 2023

Appendix 1

Group Entities

The Group contains the following fully owned subsidiaries in the UK:

- CF Bacchus PropCo Limited
- CF Bacchus Intermediate Holdco Limited
- Majestic Wine Warehouses Limited
- Wineify Limited

And the following entity in France:

- Les Celliers De Calais SAS