

Tax Strategy

Superdry is a globally recognised brand with consistent brand perceptions based on the quality, design, attention to detail and value of its clothing and accessories. The brand is present in 157 markets via a multichannel approach, tailored for each market from the business's established eight routes to customer.

This document, approved by the Board of *Superdry* plc, sets out the Group's strategy and approach to conducting its tax affairs and dealings with tax risk for the period ended 25 April 2020. In the UK this is in accordance with paragraph 16 (2) of Schedule 19 of the Finance Act 2016. Our approach to tax affairs for our international business operations is similar in all regards to that adopted for UK tax.

1. Tax risk management and governance

We maintain a separate internal tax policy as part of the Group's governance procedures. This policy is owned by the Chief Financial Officer and is managed by the Group Tax Manager.

We follow *Superdry's* risk management procedures such that we identify, assess and manage tax risks and account for them appropriately. We have implemented internal controls to provide assurance over the compliance processes and we monitor their effectiveness through periodic internal audit reviews. We report on an annual basis to the Audit Committee on how tax risks are managed, monitored and accounted for.

2. Relationship with tax authorities

We seek to foster good relationships with HMRC and to undertake all such dealings with them in a professional, courteous and timely manner. We seek to be transparent and proactive in all our interactions with them. In certain territories overseas, we use third parties to manage our tax affairs. Those third parties are asked to confirm in writing that they will engage with the local tax authorities in a similar manner.

3. Compliance principles

We seek to comply with UK tax regulations and disclosure requirements and we will pay the right and fair amount of tax in accordance with the letter and spirit of UK tax law. Additionally, we will pay the right and fair amount of tax in each territory we trade from in accordance with the letter and spirit of local laws and regimes. We understand that taxes we pay to governments of those markets in which we operate are an important source of revenue for them in providing a stable infrastructure and environment, and we seek to comply in a responsible manner.

4. UK and International tax planning

We seek to operate in the most tax efficient manner, making use of all relevant exemptions and incentives. In the UK these would be governed by UK tax law. Where they exist, we seek to apply them in the manner intended. We conduct transactions between *Superdry* companies on an arm's-length basis. We establish entities in jurisdictions suitable to hold our overseas investments, giving consideration to our business activities and the prevailing regulatory environment.

5. The level of risk we are prepared to accept

The international environment in which we operate brings an inherent element of tax risk. As with other multi-national groups, our biggest source of tax risk remains with Governments imposing different interpretations in relation to transfer pricing policy. It is for this reason that we regularly review our transfer pricing position and use third party providers to assist with documentation and benchmarking through the maintenance of both Master and local files.

Our internal tax policy and processes seek to establish and identify any potential tax risks as they arise. Where a tax risk is identified, we seek to address it in a timely and efficient manner. We are tax risk adverse. Our tax planning strategy is not aggressive and we do not engage in artificial tax arrangements.

Further information

We review and update this strategy annually and it was last approved by the Board on 18 March 2020. For any further information on this tax strategy, please contact investor.relations@superdry.com.