

# Tax Strategy

December 2025

THG

## About us

THG PLC (herein referred to as “THG” or “the Group”) is a global retailer and brand owner operating through two leading digital-first online consumer businesses: THG Beauty and THG Nutrition. THG Beauty operates prominent online platforms, including Lookfantastic, Cult Beauty and Dermstore, offering a route to market for over 1,300 third-party brands alongside a specialist portfolio of owned brands. THG Nutrition, led by Myprotein, the world’s largest online sports nutrition brand, spans multiple health and wellness categories, delivering its products both directly to consumers and through strategic offline partnerships worldwide.

THG Ingenuity was demerged from the Group on 2 January 2025. As such, this business no longer forms part of this tax strategy. The tax team was deployed appropriately as a result of the demerger, with the team structured based on the individual requirements of each business.

## Our approach to tax

THG’s is committed to full compliance with all relevant tax laws and regulations in the territories in which it operates. THG’s approach to tax is guided by its purpose and values in doing the right thing and acting as a responsible corporate citizen.

## Our strategic priorities

THG believes that the primary driver for making business decisions should not be based on tax. Our Approach to Tax is governed by the following key strategic principles, as approved by the THG Board of Directors:

- To proactively partner with the wider THG business to support the delivery of strategic objectives in a tax efficient and tax compliant manner.
- To continually enhance the tax governance and control framework and proactively manage tax risk in line with the businesses wider risk management policy.
- To strive to be tax compliant in all jurisdictions in which we operate.
- To maintain an open and transparent relationship with all relevant tax authorities (including HMRC) in the jurisdictions in which we operate and commit to resolve open matters as efficiently as possible. This includes current, past and future obligations across all relevant taxes and duties that are in scope for the Group.
- To identify and implement appropriate tax technology solutions to enhance the operational efficiency and effectiveness of the tax function.

## **Our tax governance framework and team structure**

The responsibility of THG's overall strategy and governance rests with the Board, Risk and Audit Committees. The management and governance of the tax function is delegated to the Group CFO.

- The Head of Direct Tax and the Head of Indirect Tax report on a day-to-day basis to the Group Finance Director, who then reports into the Group CFO.
- The Group Finance Director reports to the Board and Risk and Audit Committees on overall tax framework and governance matters.
- The tax function is responsible for ensuring that all applicable tax processes and tax governance procedures are observed, as well as ensuring teams are sufficiently resourced, qualified and trained. They are also responsible for ensuring that external advisers are consulted on a regular basis to ensure THG continues to comply with all underlying legislative and regulatory requirements.
- THG continually reviews the breadth and depth of tax experience across the team, which currently comprises of seven full time tax professionals. THG ensures that appropriate training is carried out for staff who manage, or process matters which have tax implications.
- The purpose of our Tax Governance Framework is to help the tax function effectively support its internal business partners to achieve their objectives, whilst ensuring tax risks are identified, managed and that THG continues to comply with all underlying legislative and regulatory requirements.
- As part of its ongoing aim to have a best-in-class tax framework, the THG Tax Function has implemented and continues to develop the following key framework / governance documents:
  - Tax strategy and governance framework approved by the Board
  - Tax code of conducts / standard operating procedures
  - Senior Accounting Officer procedures
  - Corporate criminal offence procedures
  - Tax risk register

## **Our attitude to tax risk and tax planning**

THG is a large multi-national group with operations spanning the UK, Europe, US and Asia, and as a consequence the Group is exposed to a variety of tax risks including reputational risk. THG manages these risks with the support and oversight of the Group Finance Director.

Overall, the Group is unwilling to accept a high level of tax risk and it has a desire to be tax compliant. The tax team endeavour to address any material identified tax risks in a timely manner and uses external advisors, where appropriate, to help manage those risks.

The Group is averse to participating in aggressive tax avoidance schemes. The Group will, however, operate in a tax efficient way in order to maximise stakeholder returns, so long as this is compliant and within the framework of current tax legislation. For instance, we will focus our efforts on establishing the level of our entitlement to tax incentives, such as the UK's R&D tax initiative and enhanced capital allowances while ensuring that these reliefs are not used for purposes which are knowingly contradictory to the intent of the legislation.

THG will seek the advice of external advisors when considering the appropriateness of such reliefs/incentives when these are outside of the experience or expertise of the tax team, or where there is a material degree of uncertainty.

## **How we work with HMRC**

We have an open and transparent approach to engaging with HMRC and our preference is to work together, including with THG's designated Customer Compliance Manager (CCM), to obtain a certain outcome wherever possible, for example to obtain rulings on the VAT classification of certain products.

The THG Tax function is responsible for managing all THG's relationships and interactions with HMRC, and will seek support from external advisors where this is considered to be appropriate.

THG regards this publication as complying with the duty under paragraph 16(2), Schedule 19 FA 2016 and applies to all Group companies for the accounting period ended 31 December 2025.