



Cazoo Holdings Limited ("Cazoo") – Tax Strategy

This document sets out Cazoo's approach to risk management and governance regarding taxation and fulfils the UK legislative requirements of Finance Act 2016 Schedule 19, paragraph 16(2) in relation to the publication of a tax strategy for the financial year ended 31 December 2023.

Cazoo is committed to:

- Complying with applicable tax laws and regulations in all jurisdictions where it operates. Where we detect any instances of non-compliance, we seek to resolve them ourselves and/or with tax authorities.
- Responsibly manage all taxes and tax risks relating to our business and ensure that appropriate controls are in place to maintain a high level of integrity and professionalism in the jurisdictions in which it operates.
- Ensure an open and constructive working relationship with tax authorities.
- Actively manage our transfer pricing policy to ensure that transactions between Cazoo affiliates take place on an arm's length basis in accordance with OECD transfer pricing principles and local country tax legislation, where relevant.

Relationship with tax authorities, HMRC in the UK

- Cazoo is committed to the principles of openness and transparency in our dealings with tax authorities.
- We interpret the relevant laws in a reasonable way and ensure our business structure results in a tax outcome which is consistent with where value is created and reflects both the letter and intent of the laws.
- We maintain open, collaborative and professional relationships with tax authorities, resulting in a fair and constructive exchange of information regarding our business and our tax affairs.
- We seek to resolve issues with tax authorities in a timely manner, and where disagreements arise work with tax authorities to resolve issues by collaborative agreement where possible.

Tax planning & tax risk appetite

- Cazoo is committed to paying the right amount of taxes at the right time and ensures the highest integrity in all of its tax reporting globally. When assisting our operational teams, we aim to ensure that the group's affairs are carried out in a fully tax compliant way and aligned with relevant tax legislations. Where different options are available, our decision of which approach to adopt is principally driven by commercial rationale.
- We seek to benefit from available tax incentives and reliefs in the countries in which we operate, for example, Research and Development tax credits in the UK.

Risk management

- Cazoo operates in multiple jurisdictions and - as such - is subject to various and complex tax legislation, which can be open to interpretation. The resulting tax exposure is managed by the group's tax function and/or by seeking external advice when there is uncertainty on the application of specific tax legislation.
- We adopt a low-risk approach to tax and we proactively seek to identify, evaluate, manage and monitor that risk to ensure it remains in line with the group's risk appetite. However, as a multinational corporation, we accept a certain level of tax risk due to uncertainties in tax legislation and the increasing complexity of the international tax environment, particularly with regard to transactions between our affiliated companies.
- The group's tax function is directed by the Group's Chief Financial Officer and led by the Head of Tax with support from regional tax advisors. The tax team is proactively involved in all commercial activities to provide operational teams with relevant input on business proposals. In this respect, we have defined clear lines of responsibility, ensuring that tax related decisions are taken at an appropriate level.