

PURE GYM TAX STRATEGY

Introduction

Pinnacle Topco Limited and its subsidiaries (“the Group”) operate low cost physical fitness facilities under the Pure Gym brand, trading in the UK through Pure Gym Limited. The Group is a significant contributor to the exchequer through the payment of VAT, corporation tax, employment taxes, national insurance contributions, environmental taxes and property taxes.

This document, approved by the board of Pinnacle Topco Limited, sets out the Group’s approach to conducting its tax affairs and dealing with its tax risks for the year ended 31 December 2018 and will remain valid until superseded.

This strategy is made publicly available in accordance with Schedule 19 of the Finance Act 2016.

Tax Risk Management and Governance

The Group is committed to being a responsible and compliant tax payer, managing tax risk in a manner expected by its shareholders, its members and its staff.

The responsibility for ensuring the Group’s tax affairs are conducted in accordance with this tax strategy rests with the Chief Financial Officer (“CFO”) who is a member of the board of directors.

The CFO delegates day to day management of the Group’s tax affairs to the Director of Tax and Treasury. Robust processes and controls are in place to minimise the risk of errors arising, which could impact the amount of tax that we pay. Tax risks and material tax matters are discussed and agreed with the CFO on a regular basis and reported to the board of directors as appropriate.

Attitude to Tax Planning

The Group complies with applicable tax legislation; ensuring that all taxes due are paid on time. In cases where the tax guidance is unclear or the Group does not feel it has the necessary expert knowledge to adequately assess tax consequences, we work closely with our experienced external tax advisors to support the decision making process.

Tax planning for the Group is driven by the commercial needs of the business and anticipated future developments. The tax function is therefore involved in decision making and provides an appropriate input into business proposals to ensure a clear understanding of the tax consequences of any decisions made. In no circumstances will the commercial needs of the business override compliance with applicable tax laws and regulation.

Acceptable Tax Risks

The Group has a prudent appetite for tax risk. It does not operate with prescriptive risk targets or levels, but instead assesses the tax position of transactions specific to their facts and circumstances. The complexity and materiality determines the level in the organisation at which decisions are made.

Working with HMRC

The Group is committed to maintaining an open, honest and constructive working relationship with the tax authorities, ensuring professional and timely engagement in respect of tax matters requiring further guidance or clearance.