

Sabre UK – UK Tax Strategy

Introduction

This document is the UK Tax Strategy for the companies listed in Table 1 below (collectively referred to as “Sabre UK”) which are UK subsidiaries of the Sabre Corporation group. Sabre Corporation is listed on the NASDAQ exchange in the US under the symbol SABR. Sabre Corporation is a leading software and technology provider to the global travel industry. Sabre’s retailing, distribution and fulfilment solutions serve a wide range of travel companies including airlines, hoteliers and travel agencies. Sabre operates a leading global travel market place, connecting travel buyers and suppliers.

Sabre UK report and account for UK taxation most notably corporation tax, VAT and employment taxes (PAYE and National Insurance).

Tax risks and managing tax risks

Sabre UK aims to pay the right amount of tax at the right time in compliance with relevant tax law and regulations.

We seek to minimize the risk of uncertainty or disputes. Sabre UK will put in place procedures, processes and systems to complete accurate tax computations and returns for each company. We will work with external advisers to provide guidance and support to reduce tax risk and uncertainty in direct and indirect tax matters.

Sabre UK acknowledge that the business of the group can seem complex and the operating model can change and adapt in response to market conditions and business strategy. There are multiple accounting and information systems in use, and the processes and procedures include automated and manual operations. We aim to ensure that the processes are sufficiently reliable, such that the level of routine queries received from HMRC is not excessive and is commensurate with the size and complexity of the business.

Sabre Corporation reports externally under US GAAP and in a Sarbanes Oxley (SOX) compliant manner. The group wide SOX controls in place support Sabre UK in establishing a control environment for UK GAAP and UK tax reporting. Sabre UK is subject to the Senior Accounting Officer (SAO) regime, where Sabre’s Corporate Controller takes personal responsibility for ensuring that the tax accounting processes are appropriate for Sabre UK.

Sabre’s in-house tax team are responsible for monitoring and managing appropriate control procedures to ensure compliance processes are robust and adhere to internal and external requirements. We use external advisers to support our tax compliance processes including for preparation of tax computations and returns.

Tax sensitive judgments will be made based on a reasonable interpretation of relevant information, in full knowledge of relevant tax law and, where appropriate, take account of external tax advice.

Tax planning

Sabre Corporation commits to high standards of personal conduct and business integrity around the world, governing itself with equally high standards, applying the Sabre Code of Business Ethics and corporate responsibility policies that enhance our corporate value. (Related documents can be found at: [Corporate Governance | Sabre Corporation - IR Site](#)).

We will not put in place any arrangements that are artificial, lacking in economic substance or without business purpose. We conduct transactions between group companies on an arm's length basis in accordance with OECD principles. In the context of an increasingly complex international tax environment, our tax planning focuses on eliminating double taxation and ensuring the tax consequences of any business structuring or arrangements are communicated appropriately to management before decisions are made.

Relationship with HMRC

Sabre UK believe it is important to have a good working relationship with HMRC and will work collaboratively to build a position of mutual trust. Such a position should enable HMRC and Sabre UK to resolve any areas of uncertainty efficiently, should they arise. Should the views and opinions of Sabre UK differ from those of HMRC, we expect to have an honest and open discussion of the issues before working together co-operatively to resolve our differences. If we make a mistake, we will advise HMRC of such a situation and work collaboratively to agree appropriate rectification.

We will endeavour to respond to queries from HMRC in a timely and helpful manner, and we expect that HMRC's queries will be timely and relevant.

Board Oversight

Directors on the Boards of Sabre UK shall be advised and updated by Sabre's in-house tax team of relevant tax matters at appropriate times to include filing of annual tax returns, consideration of significant transactions and updating this strategy.

Review of the Strategy

This strategy was published in March 2022, in accordance with the obligations under paragraphs 19(2) and 22(2) of Schedule 19 of the Finance Act 2016 applying to UK sub groups and qualifying companies.

This strategy applies to tax matters conducted in financial year 2022 and shall be updated in financial year 2023, not later than 31 May 2023.

Table 1

Companies applying this tax strategy (collectively referred to as “Sabre UK”):

Sabre Global Technologies Limited	Laser Holdings Limited
Sabre EMEA Marketing Limited	Leisure Cars International Limited
Sabre UK Marketing Limited	Leisure Cars Group Limited
E-Beam Limited	Last Minute Network Limited
TVL Europe	TVL Travel Limited