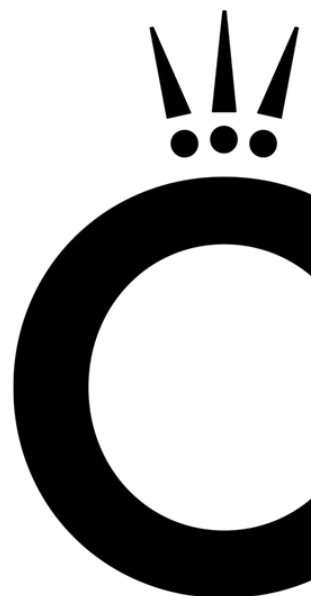


PANDORA UK

tax strategy



STRATEGY OVERVIEW

This UK tax strategy is published in accordance with the requirements of Schedule 19, Finance Act 2016, and reflects Pandora's commitment to responsible tax behavior. It aligns with our Group Tax Policy ([Tax Information](#)).

Pandora is committed to being a compliant UK taxpayer and to managing its tax affairs in a way that is consistent with our values and commercial objectives.

TAX RISK MANAGEMENT AND GOVERNANCE

Pandora operates a principal tax model, which naturally involves a significant number of intercompany transactions. All such transactions are priced on an arm's length basis, consistent with OECD guidelines and UK transfer pricing rules.

We only implement tax structures that are commercially driven and avoid unnecessary complexity. Our approach is grounded in substance over form, ensuring that tax outcomes reflect genuine business activities.

Where tax positions involve interpretation or uncertainty, Pandora engages external tax advisors to ensure decisions are well-informed and compliant.

Pandora has implemented a Tax Control Framework (TCF) covering:

- Corporate income tax
- VAT and other indirect taxes
- Customs duties
- Transfer pricing
- Tax accounting
- Withholding taxes

The TCF is regularly reviewed and updated to reflect changes in legislation and business operations. It ensures that tax processes are documented, monitored, and embedded in daily operations.

Responsibility for tax governance lies with the Group CFO, with oversight from the Audit Committee. The Board of Directors reviews the Group Tax Policy annually. Local management and directors of UK entities are responsible for ensuring compliance with UK tax laws. To execute the daily tax operations Pandora has a specialised tax function that is part of the Group CFO organization and is supported by external tax advisors.

ATTITUDE TOWARDS TAX PLANNING

Pandora's approach to tax planning is prudent and transparent. We do not engage in artificial or aggressive tax arrangements. All planning is aligned with commercial objectives and complies with both the letter and spirit of UK tax law.

We support international efforts to improve tax transparency, including the OECD's BEPS initiatives, and aim to avoid double taxation through appropriate structuring and cooperation with tax authorities.

To learn more about Pandora's tax transparency, please see our [Tax Information](#) and [Annual Report](#).

ACCEPTABLE LEVEL OF TAX RISK

Pandora maintains a low-risk approach to UK taxation. We seek to avoid tax disputes and ensure that our tax positions are defensible and well-documented.

Decisions involving significant or unusual tax risks are escalated to the Group CFO, with input from the tax function and external advisors.

RELATIONSHIP WITH HM REVENUE & CUSTOMS (HMRC)

Pandora is committed to maintaining a constructive and transparent relationship with HMRC.

We:

- Respond to enquiries in a timely and open manner
- Seek proactive engagement to resolve uncertainties
- Are open to entering Advance Pricing Agreements (APAs) where appropriate
- Aim to minimise the risk of disputes and double taxation

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