

Group tax strategy and policy

Scope

This tax strategy applies to Global Education Holdings Limited and its active subsidiaries (“the Group”) for the year ended 28 February 2025. A list of the entities to which it applies is set out below. The publication of this tax strategy statement is regarded as satisfying the statutory obligation under Paragraph 19(2), Schedule 19 of the Finance Act 2016. This strategy has been published in accordance with the requirements of paragraph 16(2), Schedule 19 Finance Act 2016. References to “tax”, “taxes” and “taxation” are to UK taxation and to all corresponding worldwide taxes and similar duties in respect of which the Group has legal responsibility.

Overall aim

The Group is committed to comply with applicable tax laws and regulations in the UK and the jurisdictions in which it operates seeking to optimise its tax position through the application of relevant tax reliefs.

The tax strategy and policy will be reviewed annually and updated accordingly in response to legislative developments.

Tax risks and management

Tax risks associated with the business predominantly relate to changes to the corporate structure, whether through organic growth, acquisition, disposal or restructure.

The Group is mindful that changes to the business, expansion onto new platforms and new jurisdictions, and the generation of new revenue streams potentially expose the Group to increased levels of tax risk.

The Group manages tax risk by designing clear and robust processes and procedures across all functions and by working closely with tax specialists in each jurisdiction. The Group has clear policies, procedures and controls in place to meet the obligations of the Senior Accounting Officer legislation which are assessed through a central risk register. These are overseen by the Group Chief Financial Officer and Group Head of Tax and are monitored and reviewed by internal teams and external tax specialists as appropriate.

The Group takes appropriate advice from suitably qualified external tax advisors to ensure compliance with applicable rules and regulations, and to consider potential mitigating actions to manage tax risks. In particular, tax advice is obtained on complex or material transactions of the Group, to ensure compliance with tax laws and that transactions are correctly reflected and disclosed in the appropriate tax filings.

As part of the continuous review of controls and procedures, the internal audit team examines areas of the business and its processes, including tax.

Internal control procedures and processes exist within the Group finance departments and systems with the aim of ensuring that information and documents that underpin taxation returns and submissions are accurate and complete. Taxation returns and submissions are subject to appropriate levels of internal and external review prior to their submission.

Governance arrangements

The Group's governance system is overseen by the GEDU Executive Board who are responsible for sponsoring and overseeing the overall Group tax strategy and policy. Appropriate accounting and financial oversight is exercised through a variety of sub-Boards or Committees, and the Executive Board monitors the performance of the business, seeking to ensure the business meets set goals on a sustainable basis with the Group Chief Financial Officer having oversight responsibility.

The Group Chief Financial Officer reports annually to the Board. The Board is provided with a quarterly report, prepared by the Group Chief Financial Officer which provides an update on key issues covering tax and compliance matters. It is the responsibility of the UK and international finance teams to ensure all taxation issues are promptly reported to the Group Chief Financial Officer as soon as they become aware of them.

Attitude towards tax planning

The Group is committed to paying the right amount of tax at the right time and seeks to have an open and honest relationship with the respective tax authorities in all relevant jurisdictions. All dealings with tax authorities will be conducted professionally, courteously and collaboratively, and the Group aims to meet its statutory and legislative tax requirements.

When entering commercial transactions, the Group seeks to take advantage of available tax incentives, reliefs and exemptions which are consistent with the spirit as well as the letter of the tax law and takes external advice to confirm this as required.

The Group is committed to complying with the Criminal Finances Act 2017, preventing the facilitation of tax evasion by associated persons worldwide. This is undertaken through developing reasonable procedures and by creating a culture of compliance across the Group. Staff and other associates should adhere to Group policies at all times.

The level of risk in relation to UK taxation

The Group seeks to comply with its regulatory obligations and ensures the tax arrangements are consistent with a low risk approach to conducting its business.

Where there is uncertainty or ambiguity over the interpretation of tax law in respect to any material transaction, external tax advice will be sought before proceeding with the transaction.

The approach towards dealings with tax authorities

The Group maintains open relationships with tax authorities in all countries in which it operates and has a transparent approach to dealing with the relevant tax authorities.

The Group commits to maintaining a low risk profile wherever possible, evidenced by:

- Aims to minimise the risk of future challenge to any tax positions taken and gain certainty in the group's tax affairs by proactively entering into dialogue with HMRC in real time with regard to issues where the correct treatment is uncertain;
- Seek to make accurate and timely disclosures as soon as reasonably practical after they are identified;
- Endeavour to resolve issues with HMRC on a real time basis and before returns are filed if possible, and where disagreements arise, work with HMRC to resolve issues by agreement (where possible);
- When required, engage with external tax advisors to provide support and/or facilitate interactions with overseas tax authorities;
- Interacting with other HEIs and providing support to the British Universities Finance Directors Group (BUFDG) tax network. This includes participating in e-mail networks and attending meetings and training events to encourage the sharing of best practice and to influence tax policy in respect of the HE sector at regional and national level.

List of active UK entities covered by this tax strategy (excludes dormant companies)

Global Banking School Ltd
Global Education Holdings Ltd
Global Edu Services Ltd
Global Edu Cafeteria Ltd
Global Edu Properties Ltd
Language Path Education Ltd
Path Creative School Ltd
MetaGedu Apprenticeships Ltd
MLA College Limited