RYANAIR

Tax Strategy

This paper sets out the UK tax strategy of Ryanair Holdings plc ("Ryanair") and its UK subsidiary undertakings. In making this tax strategy available, Ryanair is fulfilling its obligations under Schedule 19 of UK Finance Act 2016 in respect of the financial year ending 31 March 2023. The strategy has been published in accordance with paragraph 19(4) of the Schedule.

This strategy applies from the date of publication until it is superseded.

Risk Management and Governance in Relation to UK Taxation

- Ryanair is committed to maintaining a high standard of corporate governance and has the appropriate arrangements and structures in place which are designed to ensure compliance with Ryanair's tax obligations in the UK and in each of the jurisdictions in which it operates.
- The Ryanair Group Tax Department have responsibility for ensuring adherence by Ryanair Group companies to its tax strategy, policies and procedures. Through the Audit Committee, the Board have oversight of tax compliance risk and tax planning.
- Potential tax risks are identified and assessed regularly, with the appropriate processes and controls
 put in place to mitigate these risks to an acceptably low level.
- Support and advice in respect of tax compliance and tax technical issues are provided by external advisors, as appropriate.

Attitude to Tax Planning in the UK

- Tax planning activities in the UK are limited to those that support our business and reflect commercial and economic activity.
- Ryanair adheres to the relevant UK tax law and seeks to minimize risk of uncertainty or disputes.
- Transactions between group companies are conducted on an arm's length basis and in accordance with OECD principles.

Level of Risk in Relation to UK Taxation

- Ryanair seeks to safeguard its reputation as a responsible taxpayer and is mindful of any tax reputational issues for its shareholders in both the UK and in their other respective jurisdictions.
- Ryanair seeks to minimise UK tax risk and uncertainty by ensuring that efficient tax treatments are applied to business decisions that are consistent with both the letter and spirit of the law.

HMRC Interaction

- Ryanair engages with HMRC in an open, honest and transparent manner. Ryanair's aim is to avoid unnecessary disputes with HMRC and thus minimise tax risk and uncertainty.
- Any material business decisions with potential UK tax implications are actively discussed in a proactive manner with HMRC.