



Ryanair Holdings plc (“Ryanair”) is Europe’s largest airline group and parent company of Ryanair DAC, Ryanair UK Limited, Ryanair Sun S.A. (“Buzz”), Lauda Europe Limited and Malta Air Limited, amongst other subsidiary undertakings in the UK and across Europe. Ryanair currently connects over 223 destinations in over 36 countries, offering the lowest fares in Europe and continues to expand and grow this offering.

## **UK Tax Strategy**

Ryanair publishes this UK tax strategy on behalf of its UK subsidiary undertakings, fulfilling Ryanair’s obligations under Schedule 19 of UK Finance Act 2016 in respect of the financial year ending 31 March 2027. The strategy has been published in accordance with paragraph 19(4) of the Schedule. The strategy applies from the date of publication of 1 March 2026 until it is superseded.

## **Risk Management and Governance in Relation to UK Taxation**

- Ryanair is committed to maintaining a high standard of corporate governance. Ryanair has the appropriate arrangements and structures in place, which are designed to ensure compliance with Ryanair’s tax obligations in the UK, as well as in each of the other jurisdictions in which Ryanair operates.
- The Ryanair group tax department has responsibility for ensuring adherence by Ryanair (and subsidiary undertakings) to the tax strategy, policies and procedures implemented within the Ryanair group. Through the Audit Committee, the Board has 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.

## **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 to an acceptably low level.
- Transactions between Ryanair 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 intends to safeguard a reputation of a socially responsible taxpayer, paying and remitting the right amount of tax on time to HMRC (and any other tax authorities the Ryanair group interacts with).
- Ryanair is mindful of any tax reputational issues for shareholders and wider stakeholders in both the UK and any other respective jurisdiction the Ryanair group operates.
- Ryanair seeks to minimize 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.
- Ryanair’s main tax exposures in the UK relate to air passenger tax, corporation tax, employment taxes, VAT, customs duty and stamp duty.
- Ryanair’s transfer pricing policies are compliant with OECD Transfer Pricing guidelines and adhere to the “arm’s length” principle set out for large multinational groups.
- Ryanair manages its UK tax obligations inhouse through the Ryanair group tax department, with the assistance of external tax and legal advisors as appropriate.

## HMRC Interaction

- Ryanair actively engages with HMRC to ensure communication is proactive, open and transparent. This helps Ryanair ensure any uncertain in tax positions in the UK are at acceptably low risk level.
- Any decisions of a material nature affecting Ryanair's UK operations from a tax perspective are raised with HMRC in an open and proactive manner.