

## **MGE Global Holding Limited – Tax Strategy for the year ended 30 September 2024**

This document sets out the tax strategy for MGE Global Holding Limited and its UK subsidiaries (herein referred to as “MGE UK” or “the Group”) as required by paragraph 19 Part 2 Schedule 19 of Finance Act 2016. The document is effective for the year ending 30 September 2024 and is subject to periodic review and update.

This tax strategy outlines the Group’s approach to conducting its tax affairs and dealing with tax risks. The strategy applies to both UK and non-UK taxation for which the Group is required to account, including corporation tax, indirect taxes (including VAT) and employment taxes which are payable and reportable to the HM Revenue & Customs (HMRC) or the applicable non-UK tax revenue authority (each a “Tax Authority”).

The Group’s approach to tax is to ensure that it is compliant with all relevant and applicable tax legislative requirements in the UK and wherever it does business globally (including the USA, Canada, Jersey and South Korea). The Group is committed to acting responsibly and paying all applicable taxes due on a timely basis.

### **Management of tax risks**

The MGE UK Board of Directors have responsibility for the overall governance of the Group, including ensuring that it aligns with that of Mohegan Tribal Gaming Authority. The MGE UK Board of Directors’ aim is to ensure that the Group achieve its commercial objectives, whilst adhering to its financial and tax obligations in applicable jurisdictions.

Day-to-day management of MGE UK’s tax governance sits with the MGE UK Board of Directors, who are supported by an experienced finance team.

The MGE UK Board of Directors and finance team consistently engage with trusted external advisors to help the Group ensure that:

- The tax strategy is adopted and followed consistently across the Group, with clear lines of responsibility and accountability;
- The tax strategy aligns with the Group’s and Mohegan Tribal Gaming Authority’s overall approach to corporate governance and risk management; and
- MGE UK pays the correct amount of tax required by the applicable legislation, at the correct time.

The Group is committed to ensuring that it has appropriate tax controls and processes in place. The Group’s finance team regularly works with trusted professional external advisors who provide support with various tax related matters, including making filings and reporting tax obligations on time to the relevant Tax Authority.

### **Attitude to tax planning**

The Group’s attitude to tax planning is aligned with its core values and approach to doing business. The Group does not actively participate in any artificial tax planning arrangements, with all business decisions being driven by commercial factors and objectives.

MGE UK only utilises tax incentives and reliefs that are aligned with the Group’s commercial aims and takes steps to ensure that the use of any such reliefs is compliant with both the letter and the spirit of the law.

The MGE UK Board of Directors and finance team work with trusted external professional advisors on a regular basis when tax matters arise:

- that are deemed sufficiently complex or material to the Group;

- where there is a significant degree of tax uncertainty;
- where tax guidance is unclear; or
- where there is insufficient expertise or knowledge within the team to adequately assess the tax risks and consequences of transactions under consideration.

### **The level of risk the Group is prepared to accept for UK taxation**

MGE UK has a low tolerance and risk appetite for tax and will engage with trusted external tax advisors to identify and mitigate potential tax risks associated with the Group's commercial transactions. Transactions are aligned with the Group's commercial values and aims whilst remaining compliant with all relevant and applicable tax regulations.

### **Working with HMRC**

MGE UK is committed to ensuring that all engagement with HMRC is carried out in a highly professional, transparent and proactive manner across all relevant taxes and duties, with a view to meeting the Group's aim of ensuring that its statutory and legislative tax requirements are met accurately and on a timely basis.

In any instance where an issue may arise, the Group will actively seek to obtain a resolution through agreement with HMRC in a collaborative and timely manner. Where there is any uncertainty in the Group's tax position, the Group will engage with trusted external advisors to assist with resolving such matters.

This tax strategy was approved by the Board of Directors of MGE Global Holding Limited on June 20, 2024.