

*Vinted*

# Global Tax Strategy

Vinted Group (hereinafter - Vinted or Group) operates in markets across Europe, as well as the USA. The main focus of Vinted is the provision of an online marketplace for buying and selling second-hand items, predominantly clothing. The company's mission is to make second-hand the first choice worldwide.

Vinted Go launched in 2022, with a focus on developing products and solutions for more seamless shipping and delivery across Europe.

#### Commitment to Compliance

Vinted has its own aligned values framework, according to which it challenges and shapes itself for the future. From a tax perspective, it maintains a high level of compliance with tax laws and regulations that are constantly changing. For Vinted, compliance means paying the right amount of tax in the right place at the right time and claiming reliefs and incentives in line with the provisions of the tax law, where available.

#### The Purpose of the Global Tax Strategy

The Global Tax Strategy reflects Vinted's approach and roadmap to tax risk management, governance, and planning, including cooperation with tax authorities. Vinted aims to ensure compliance with local and international tax laws, rules, and regulations, while ensuring that the management of its tax obligations is clear and understood.

In compliance with paragraph 16(1) of Schedule 19 of the UK Finance Act 2016, the Global Tax Strategy applies to incorporated Vinted entities as well as non-UK incorporated entities under the Topco, Vinted Limited.

The Group's CEO has approved the Global Tax Strategy in respect of the financial year 2025, ending on December 31st. The Global Tax Strategy is updated on an annual basis.

#### Tax Governance

Vinted implements its risk governance by having clear continuous processes and procedures where tax affairs are managed in a way that considers the Group's reputation and aligns with high standards of governance. The Group is following risk management standards established by the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and the best-known practices.

The purpose of following COSO standards is to implement a defined Risk Management Framework (RMF) within Vinted. The RMF is an essential guideline used throughout the organisation, including by the Tax team, to effectively identify, analyse, evaluate, manage, and monitor enterprise risks, including tax risks.

The Group's CEO has the primary responsibility for risk oversight, leaving the day-to-day responsibilities of managing risk to Vinted's

management team. The risk oversight performed by the Group's CEO includes: reviewing, challenging, and concurring with the management team on proposed risk management strategy and risk management objectives; their alignment with business objectives, mission, and core values.

As to the tax risks, members of the Tax team are responsible for supporting the wider business to ensure the identification and assessment of tax-related risks, including risks arising from new projects or changes in processes. The Director of Tax is responsible for reviewing tax-related risks every quarter (including ensuring that an anticipated risk mitigation strategy is designed and implemented).

### Tax Risk Management

The attitude of Vinted towards risk management is based on the principles of reasonable care and materiality. Each tax risk is measured according to its likelihood and severity, taking into account implemented controls that are mitigating the risk. Vinted is not attempting to avoid risk but aims to manage the Group's exposure to risk instead.

At Vinted, the main tax risk areas that Vinted focuses on are financial accounting, transactional, compliance, and reputational.

Financial accounting risk - employees of the Group Accounting team are responsible for ensuring that tax returns are submitted, taxes and tax-related amounts are paid within the dates and procedures set by laws. Financial accounting risk management is performed using appropriate procedures and controls.

The use of external advisors enables Vinted to effectively manage tax compliance obligations commensurate to the growth of Vinted. It includes payroll, Corporate Income Tax (CIT), and Value Added Tax (VAT) calculations for the non-Lithuanian based entities of Vinted. Payroll, CIT, and VAT calculations for the Lithuanian entities of Vinted, control and management are taken by the Group Accounting.

Transactional risk - arises when transactions with third parties are carried out. The Legal and Tax teams (a team separate from the Group Accounting team), jointly with other teams within Vinted, assess the risk of ongoing and non-routine types of transactions (e.g. acquisitions). Vinted applies a cautious approach when it comes to transaction related tax risks.

The transactional risk also arises when transactions between associated entities are concluded. Considering the global attitude

towards transfer pricing, Vinted follows a framework for implementing inter-company transactions under the Arm's Length Principle, which incorporates the OECD Transfer Pricing Guidelines as well as local regulations.

Compliance risk - refers to the possibility of failing to meet tax compliance requirements while completing, reviewing, and submitting tax and tax-related returns for Vinted. To ensure effective compliance, the Tax team assists the Group Accounting by reviewing VAT and CIT returns, as well as answering ad hoc questions.

The Tax team monitors tax-related risks for the Group, contributes to new EU and local initiatives and policy making, and keeps up with developments in the tax field.

Reputational risk - Vinted takes proactive measures to minimise any reputational risk related to tax affairs. Publicly known tax issues can have a widely negative impact on Vinted's brand, business reputation, and customers' or suppliers' behaviour.

### The Attitude of the Group Towards Tax Planning

Vinted's approach to tax planning is in line with the tax framework applicable to Vinted which includes obtaining full understanding, advice, and good record keeping. Vinted utilises tax incentives and statutorily available reliefs offered by governments.

Vinted strives to have strong tax administration to ensure compliance with regulations and to minimise any potential risks that may arise, it seeks advice from qualified and experienced external tax advisors. Tax advisors provide advice and allow Vinted to make informed decisions regarding tax matters.

### Group Risk Appetite

International and local laws and guidelines issued by tax authorities (including HMRC) are followed. Vinted adopts a conservative and low tax risk approach which is a carefully calibrated part of the business model that aligns with strategic and corporate objectives. Additionally, Vinted adopts a zero-tolerance approach to tax evasion and facilitation of tax evasion (as per the Group's Code of Conduct).

### Managing Co-operation with Tax Authorities

Vinted is always ready to cooperate and actively engages with local tax authorities in regions where Vinted has a presence. This ensures compliance with local and international legislation and is in line with Vinted's approach to being open and transparent. Cooperation with tax authorities also includes responding to any queries and ensuring strong tax administration that includes accurate and timely filing of returns and payment of taxes.

Vinted communicates as appropriate with tax authorities regarding various developments in Vinted's business, current and potential tax risks (if any), and interpretation of tax laws. Vinted strives to ensure that all tax authorities are promptly informed about any significant transactions or changes in its business operations.

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