

# UK TAX STRATEGY



## General

As an international company operating in several countries, Coty Inc. ("**Coty**") is subject to various tax regimes and regulations and takes into account any changes in tax law. Coty is specifically vigilant about the changes that could result in higher tax expenses and payments, higher compliance costs or that may affect Coty's tax liability, return on investments and business operations.

Coty firmly believes it is the right of governments to determine what a fair share of tax is and to draft tax laws accordingly. It is not the role of business to form views on what level of taxation is fair. Accordingly, we expect to pay tax on income in the country where activities take place with the caveat that double taxation of the same activity by different jurisdictions should be avoided.

Coty has a global regional International Tax Director, as well as a regional Tax Director, who are supported by local finance teams and professional external advisors, that works jointly with the Group Tax Department ("**Group Tax**") based in New York, United States, to ensure that UK tax regulations are well understood and that Coty is in full compliance with the UK tax legislation.

## Our Tax Strategy

Under UK tax law, for the year ended 30 June 2019 and future periods, Coty Inc. is required to publish its UK tax strategy on the internet. The tax strategy must be made available to the public free of charge. The publication contained below is Coty Inc.'s response to this legal requirement.

In order to comply with both the letter and the spirit of the tax laws, Coty's tax strategy comprises the following key principles:

### *1. Effective risk management and governance*

Coty has established and continues to manage robust tax governance processes that ensure full compliance with tax disclosure and filing obligations in the key jurisdictions in which it operates, including the UK.

Coty will continue to manage tax risks in such a way as to ensure that key risk areas are monitored and material risks minimized.

### *2. Responsible tax planning*

Coty engages in reasonable tax planning that is aligned with the commercial and economic activity of the business.

Coty follows the terms of UK's Double Taxation Treaties and relevant Organization for Economic Co-Operation and Development ("OECD") guidelines for international tax matters.

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## Our Tax Strategy (cont.)

Tax incentives or opportunities for obtaining tax efficiencies will be utilized when these incentives or opportunities do not carry significant reputational risk or significant risk of damaging our relationship with HM Revenue & Customs (or any other tax authorities), are aligned with the intended policy objectives of the governments which introduced the incentives, do not have a material adverse impact on “above the line” results, and are aligned with business or operational objectives.

### 3. Risk appetite

Coty aims for certainty on the tax positions that it adopts, but where tax law is unclear or subject to interpretation, written advice or confirmation will be sought as appropriate from professional external advisors to ensure that our position would, more likely than not, be settled in line with the filing position adopted in the tax return.

Coty applies diligent professional care and judgment to arrive at well-reasoned conclusions by, in part, consulting with top tier law and accounting firms to obtain expert, objective advice and opinion on tax matters.

### 4. Open engagement with HMRC

Coty will maintain an open and transparent relationship with HM Revenue & Customs (and other tax authorities) by working in a collaborative, transparent and proactive way. We strongly support the view of the OECD that both taxpayers and tax authorities benefit from the increased disclosure and transparency. Improved relationships mean tax authorities can make more effective risk assessments that are open, impartial, proportionate, responsive and grounded on an understanding of our commercial environment, while taxpayers can better manage tax risks and reduce compliance costs.

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## Our Tax Strategy (cont.)

This tax strategy is applicable for the period ending 30 June 2019 and has been collectively approved and owned by the Senior Vice President of Global Tax, Senior Director of Tax Compliance and Reporting and the Director of Tax Planning.

The following legal entities regard this publication as complying with the duty under Paragraphs 19(2), Schedule 19 of Finance Act 2016:

- Coty UK Limited
- Coty Export UK Limited
- Coty Services UK Limited
- Coty Manufacturing UK Limited
- Coty Brands Group Limited)
- Del Laboratories UK Limited
- Beauty International Limited
- Rimmel International Limited
- Lancaster Group Limited
- Bourjois Limited
- Coty UK&I Ltd
- HFC Prestige Manufacturing UK Ltd
- HFC Prestige Products Limited
- HFC Prestige Service Ltd
- Beamly Limited
- Jemella Ltd
- GHD Group Holdings Ltd
- Lion/Gloria Topco Ltd
- ghdNominees Ltd
- Lion/Gloria MidCo Ltd
- Lion/Gloria MidCo. 2 Ltd
- Lion/Gloria MidCo. 3 Ltd
- Lion/Gloria Holdco Ltd
- Lion/Gloria BidCo Ltd
- Jemella Group Ltd
- GHD Bondco PLC
- GHD EBT Company Ltd
- GHD Holdings Ltd
- GHD Group Ltd
- Jemella Group (Holdings) Ltd
- Power Promotions Ltd
- Power Wizards Ltd
- Wonderful Life UK Ltd
- Wonderful Life Ltd