



Flatfish Ltd

Tax Strategy

Year Ended 31st December 2026

This statement sets out the tax strategy for Flatfish Ltd and its subsidiary, Regal Fish Limited, in accordance with paragraph 19(2), Schedule 19 of the Finance Act 2016. This strategy applies from the date of publication until it is superseded.

The strategy applies to corporation tax, indirect tax, VAT, stamp duty, payroll taxes and all climate and environmental taxes and sets out the policy and approach to conducting its tax affairs.

The approach to tax risk management

Flatfish Ltd manages risk to ensure compliance with legal requirements and to ensure that the correct amount of tax is paid when it falls due. The business takes a conservative approach to tax risk and has an experienced finance team ensuring that diligent care is applied to all processes which could materially affect its compliance with tax obligations. Advice is sought from external tax advisors where appropriate with the intent to be compliant with relevant tax law.

The Flatfish Ltd Board of Directors are responsible for tax strategy and policies with the Finance Director having delegated responsibility for their implementation.

Attitude to tax planning

The business recognises its responsibility to optimise overall returns to its investors in its recommendation of the way commercial or business opportunities are evaluated and implemented, however in doing so always aims to be a transparent and responsible tax payer.

The business does not participate in any tax planning arrangements that do not comply with either the legal interpretation or spirit of tax laws. This does not preclude us from responding to tax incentives and reliefs where appropriate, in a way that is consistent with HMRC and government policy.

Level of Risk

We have a low tolerance for tax risks and seek to minimise the risk of uncertainty and tax disputes.

Working with HMRC

Flatfish Ltd seeks to ensure that our engagement with HMRC is professional, open and honest, and undertaken in a collaborative manner.

This strategy was approved by the Board of Flatfish Ltd on 29th October 2025