Virgin Atlantic – UK Tax Strategy

1. Introduction

At Virgin Atlantic, our purpose is to ensure every journey matters - for our customers, our people and the communities we serve. A responsible and transparent approach to tax is a key part of that commitment. This strategy sets out how we manage our UK tax affairs for the year ending 31 December 2025 and applies to all UK entities within the Virgin Atlantic Group.

We are committed to paying the right amount of tax at the right time, as prescribed by legislation, and acting with integrity in everything we do.

2. Tax Governance and Risk Management

Strong governance sits at the heart of how we run our business, tax is no exception.

The Virgin Atlantic Board has overall responsibility for the Group's tax strategy. Material tax matters are considered regularly as part of our wider governance, ensuring that tax implications are understood and appropriately managed in major business decisions.

Our CFO, who is also our SAO, is accountable for ensuring the Group maintains appropriate tax accounting arrangements, supported by internal controls, clear documentation, and strong financial systems.

Our tax affairs are managed by an experienced in-house tax team, supported where needed by external advisers to ensure we meet high standards of compliance, accuracy and professionalism. The team is consulted early in significant projects, so tax risks and opportunities are properly assessed.

The business has a robust risk management framework which is set out in the annual accounts on our website. We adopt a prudent approach to tax risks. Risks are assessed regularly and mitigated through internal processes, technical reviews and - where appropriate - engagement with HMRC. We seek external advice on areas of uncertainty to ensure our positions are clear, robust and well supported across all taxes.

3. Attitude to Tax Planning

Virgin Atlantic engages in tax planning only when it supports genuine commercial activity and aligns with our values.

- We do not enter into artificial structures or arrangements designed for tax avoidance.

- We will claim reliefs, incentives, or exemptions that are clearly intended by legislation and are aligned to the commercial and economic reality of the Group's activities.
- Tax planning is limited to structuring the Group's affairs in a manner that is wholly consistent with both the spirit and letter of the law.
- We consider our brand, reputation and corporate responsibility in every significant tax decision.

Our approach is guided by integrity, transparency and ensuring we contribute fairly to the societies in which we operate.

4. Level of Tax Risk We Are Willing to Accept

While the scale and complexity of our operations mean some risk is inevitable, we work to minimise uncertainty and avoid contentious positions.

Where uncertainty exists, we seek clarity through technical advice or direct engagement with HMRC. We prioritise certainty and compliance over the pursuit of tax advantage.

5. Working with HMRC

Virgin Atlantic is committed to maintaining a professional, open and collaborative relationship with HMRC.

- We provide full, accurate and timely disclosures in our tax filings.
- We engage with HMRC proactively, particularly on complex or significant matters.
- Where errors or uncertainties arise, we correct and disclose them at the earliest opportunity.
- We aim for constructive, real-time engagement to support efficient and cooperative compliance.

Our approach is rooted in transparency, mutual respect and a desire to resolve matters swiftly and fairly.

6. Publication and Review

This UK Tax Strategy is published on the Virgin Atlantic website in accordance with Schedule 19, Finance Act 2016, paragraph 16.2 for the year to 31 December 2025. It is owned by the Board, endorsed by the CFO and implemented by the Tax Team. The strategy is reviewed annually and remains in effect until replaced.