Introduction

We are committed to high standards of corporate governance, transparency and responsibility in supporting the execution of our global business strategy which is to drive profitable growth in our businesses and deliver sustainable returns for our shareholders. Our approach to tax supports this strategy.

Our tax strategy and its application:

Our UK tax strategy for the year ended 30 September 2027 applies to all UK entities that are part of The Walt Disney Company group, and will be reviewed on a regular basis. This tax strategy and its underlying principles guide the decisions we make relating to UK tax matters, and is in line with the Global tax strategy for the group (Disney-Global-Tax-Strategy-Policy-Statement.pdf).

Governance and management of tax risk

The Board of The Walt Disney Company Limited oversees the UK tax strategy. The delivery of the strategy is supported by the EMEA (Europe, Middle East & Africa) tax, finance and accounting teams.

We operate a tax control framework which focuses on having a sound control environment, including effective risk identification, communication channels and monitoring of compliance with relevant legislation and guidance and compliance with our UK tax strategy.

Governance of tax matters is subject to rigorous internal review and oversight by members of the global tax function with input and oversight from controllership, finance, management audit, and other Corporate functions where relevant. The Audit Committee of the Board of Directors receives periodic updates on tax matters. To this end, we require adherence to our Standards of Business Conduct which set out the behaviours expected of our employees and compliance with applicable laws and regulations. Furthermore, we operate with a zero tolerance approach to tax evasion and the facilitation of tax evasion.

Attitude to tax planning and the level of tax risk

We aim to ensure that all tax positions are built on sound commercial business activity. Where eligible, we claim the benefit from credits, incentives and elective provisions that are intended to lower the cost of doing business or otherwise encourage investment.

In appropriate circumstances we seek certainty on inherently uncertain tax positions by obtaining external advice or by seeking advance clearance with the relevant tax authority. This can include obtaining agreement on a unilateral or bilateral basis with respect to transfer pricing positions to ensure agreement that the amount of profit reported is aligned with where value is created. We do not engage in aggressive tax planning schemes, and our appetite for risk is low in this regard.

We seek to adhere to relevant tax laws in all countries where we do business. We engage in efficient tax planning that supports our business and reflects commercial and economic activity. We do not engage in artificial tax arrangements.

Working with Tax authorities

We work in a collaborative, transparent and proactive manner with revenue authorities and policy makers and interact with these bodies in a professional, courteous and timely manner.

We consider that the publication of this statement complies with the duty as set out in Paragraph 19(2) Schedule 19 Finance Act 2016.