

2024 AMC UK tax strategy

Foundation of Tax Strategy

AMC UK tax strategy is to:

- Manage the tax cost as well as tax risks of the UK Group efficiently. This is done by paying UK cash taxes where required and monitoring the UK group's effective tax rate.
- Develop staff and consult tax professionals - UK tax team will consult tax advisers where required and other AMC teams in the business and by applying relevant UK and international tax laws.
- Ensure timely compliance and reporting of UK and other statutory obligations. AMC UK tax team follows guidance provided by HMRC and OECD, with particular focus on Senior Accounting Officer requirements, OECD Tax Pillar 2 and Transfer Pricing reporting in 2024.

Objective of Policy

This publication is in relation to the year ended December 2024, in compliance with the requirements under Part 2 of Schedule 19 in FA 2016.

This document outlines the management of UK tax risks presented to AMC group. It sets out to show that the UK tax team continually manages risks in line with UK and OECD legislation and guidance. AMC aims to fully comply with its global tax obligations. The group pays a range of taxes globally, including but not limited to corporate tax, indirect taxes, employment taxes and duties. This strategy applies to all individuals and departments where their actions and activities can have a tax impact.

Group description

AMC Networks Group ("AMC") listed on NASDAQ:AMCX is a US-based global entertainment group and international distributor of award-winning content and channels. The group owns and operates various content brands including AMC, IFC, BBC America, Sundance TV and Acorn TV. These programmes are distributed domestically and internationally across linear networks, digital streaming services (AMC+ as well as Amazon Prime and Apple TV) and home video

The UK divisions of AMC include:

- AMC Networks International UK ("AMC UK"), which is part of the international segment of the group ("AMCNI"). AMC UK delivers programming to subscribers in territories including Africa, Europe and the Middle East. The international segment distributes the AMC global brand as well as other local channels in varying genres.
- The RLJ Entertainment Group in the UK, which develops and produces content for Acorn TV worldwide and distributes programming outside of the US and Canada.
- AMC's in-house UK Studio, which produces television programmes in the UK. These include The Walking Dead: Daryl Dixon (FTWD), Talamasca and Interview with A Vampire Season 2.

Approach to tax management

AMC's approach to tax management in relation to the UK is to operate:

- Within the core strategy of the AMC; and
- In compliance with relevant laws, regulations and reporting requirements; and
- In accordance with other AMC policies and codes.

Approach to risk management and governance

AMC's approach of the group to risk management and governance arrangements in relation to UK taxation:

- Tax risks can arise due to outside influence (e.g. new legislation) or internal factors (e.g. a tax position taken).
- Prior to taking a tax position, an assessment of the UK tax risk is undertaken to determine whether the tax position complies with applicable tax laws and is appropriate under the applicable AMC corporate governance and tax risk framework. This seeks to ensure that there is a clear understanding of and adherence to the procedures in place for tax risk management and governance. This involves oversight by relevant management.
- AMC manages tax risk by ensuring that the in-house tax team are appropriately trained and qualified to manage and monitor such risks. Where required, advice will be sought by external advisers.

Level of risk in relation to UK taxation that the group is prepared to accept:

- AMC aims to ensure that any tax risks are appropriate under the AMC corporate governance and tax risk management framework.
- Where appropriate, AMC will seek advice from external advisors to confirm positions taken or anticipated to be taken.
- All AMC employees are required to comply with AMC policy as well as relevant laws and regulations. This includes Corporate Criminal Offence training module which will be launched in December 2024.
- AMC has implemented reasonable prevention procedures to help prevent associated persons from facilitating tax evasion. AMC continues to assess and review the current compliance model to protect the business from liability under the CCO legislation.

Approach to tax planning

AMC's attitude of the group towards tax planning (in relation to UK taxation):

- AMC ensures that tax planning is aligned to commercial and business objectives and is assessed from a risk perspective. This includes obtaining external advice where appropriate.
- AMC UK tax team liaises with other departments and with the Board of Directors when deemed necessary.
- AMC tax teams maintain Local and Master Transfer Pricing documentation which supports the corporate tax return positions and aligns to the principles of the OECD guidelines where required.
- AMC UK tax team remains up-to-date on tax developments which may impact the group. This includes the enactment of UK legislation affecting the group as well as international initiatives such as the OECD's Base Erosion and Profit Shifting (BEPS) and other jurisdictions' laws.
- AMC tax team has implemented the OECD Pillar 2 / Global Anti-Base Erosion (GloBE) requirements and assessing the impact on the group. The rules became effective in 2024 and AMC tax team is liaising with advisers and software providers to comply with Pillar 2 requirements. In the UK specifically, a Domestic top-up tax (DTT) will be applied to qualifying entities in the UK with an effective tax rate (ETR) below 15%.

Tax authority communication

Approach of group towards its dealings with HMRC:

- AMC aims to have a constructive and professional relationship with HMRC based on mutual respect.
- In February 2019, HMRC undertook a Business Risk Review and concluded that AMC Networks Group should be classified as low risk.
- AMC UK is no longer part of HMRC Large Business division and as a result no longer has Customer Relationship Manager. AMC UK tax team proactively seeks guidance from HMRC or advisers as and when required.

Relevant stakeholders

UK Head of Tax - Camille Graham-Smith

UK Tax Manager – Rochelle Withey

UK VP Finance – Tom Prentice

EVP General Counsel AMCNI – Rutger Andree Wiltens

Chief Tax Officer – Sal Focella

US VP International Tax – Christopher Brown