

## UK TAX STRATEGY

The following information is provided by Papa John's Pizza Limited in compliance with its duty pursuant to Part 2 to Schedule 19 to the Finance Act 2016 to publish a tax strategy for the year ending 25 December 2017, which will apply to the following UK companies:

- Papa John's Pizza Limited;
- Papa John's (GB) Holdings Limited; and
- Papa John's (GB) Limited.

### Governance

Subject to the authority of the Papa John's International, Inc. Board of Directors, the Papa John's Tax Department will have ultimate responsibility for administering this UK tax strategy and for the UK sub-group's overall compliance. This document will be periodically reviewed and internal procedures implemented and adapted where appropriate to ensure compliance with the strategy.

Our strategy reflects our status as a listed company on the NASDAQ Stock Market, including our disclosure obligations and reputational considerations. As part of a multinational group, our UK subsidiaries are aligned with and follow the [Papa John's International, Inc. Code of Ethics and Business Conduct](#) which applies to all members of Papa John's staff worldwide. The Audit Committee of the Board also provides regular oversight as to tax matters.

### Tax Planning

We aim to conduct business lawfully and responsibly while applying the highest moral and ethical standards. We make tax a part of every important business decision and report and disclose our tax positions in accordance with all applicable laws, rules and regulations.

Our affairs are structured in accordance with our Code of Ethics and Business Conduct. We utilise available reliefs and allowances where appropriate in the manner in which they were intended by law. We do not engage in artificial tax arrangements, nor do we employ legal entities for the purposes of tax avoidance. We have an in-house specialist tax function and advice is sought from appropriately qualified external advisors where appropriate.

### Level of risk in relation to UK taxation

While our internal governance is not prescriptive on the levels of acceptable tax risk, we are committed to ensuring we pay the right amount of tax in the UK and worldwide. Accordingly, we seek to:

- Comply with all applicable tax laws, rules and regulations in every jurisdiction in which we conduct business
- Meet internationally recognised standards such as the OECD arm's length principle in transfer pricing matters
- Ensure we accurately reflect all transactions in financial statements and records
- Make full, fair, accurate, timely and understandable disclosure
- Promptly inform HMRC if any inadvertent error is identified in a submitted tax return and pay any additional tax, interest and penalties that may become due as a result

## **Relationship with HMRC**

We strive to keep to the principles of honesty, fairness, mutual respect and trustworthiness in our dealings with tax authorities wherever we operate around the world.

In the UK, our professional tax advisers act as our agent, liaising with HMRC on our behalf. Our focus is on timely tax compliance, ensuring all taxes are promptly paid in full and all filings are duly submitted within the relevant timeframe.