

Enterprise Rent-A-Car's Tax Strategy

This tax strategy document is published by Enterprise Holdings (a group of companies which includes the UK entities referenced in exhibit A (“UK Group”)). It is effective for the fiscal year ending July 31, 2018 and is made publically available to comply with the UK Group’s duty under Schedule 19 of the Finance Act 2016.

The UK Group is committed to acting with integrity and transparency in all tax matters. It strives to fully comply with UK tax laws, compute its tax liabilities accurately, and pay its taxes timely.

Approach of the UK Group to risk management and governance arrangements in relation to UK Tax

Governance

UK Group financial controllers partner with the corporate tax and financial teams of Enterprise Holdings, Inc., (“Enterprise”) the parent company of the Enterprise Rent-A-Car worldwide group (“ERAC Worldwide Group”), to manage UK tax risk and to ensure the strategy adopted is consistent with the ERAC Worldwide Group’s overall tax strategy.

UK Group and Enterprise corporate tax and finance teams are accountable to the Enterprise Board of Directors for the management of tax and related risk.

Risk Management

The UK Group is committed to complying with all applicable tax rules and regulations, and to exercising professional diligence and care in the management of all risk associated with tax matters. The UK Group is also committed to exercising diligence and adopting adequate procedures designed to prevent its associated persons from evading UK or foreign taxes or facilitating evasions by others when acting for the UK Group.

The UK Group mitigates tax risk by utilizing an internal audit team to review compliance with internal accounting policies and procedures and employing qualified accountants that understand tax issues and identify areas of tax uncertainty. Tax questions are channeled through employees in the corporate finance and tax departments who have the necessary experience and knowledge and have established relationships with HMRC and professional tax advisors, to put together best practices for the entire business.

Attitude of the UK Group towards UK tax planning

The UK Group engages in tax arrangements that are well-established and thoroughly researched. The UK Group recognizes its responsibility to pay its fair share of tax where it operates and balances that with its responsibility to its stakeholders to structure its affairs in a prudent business manner. When structuring its tax affairs, the UK Group avoids behavior which could be contrary to existing anti abuse legislation.

Level of risk in relation to UK taxation the UK Group is prepared to accept

Tax law is complex, so where the law is unclear or subject to interpretation, the UK Group adopts tax positions that are at least more likely than not to be allowed by HMRC.

Approach of the UK Group towards dealing HMRC

The UK Group supports a relationship with HMRC based upon mutual trust and respect which enables constructive dialogue and responsiveness by all parties, and maintains a transparent and constructive relationship with HMRC through regular meetings.

When submitting tax computations and returns to HMRC, the UK Group discloses all relevant facts and any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practical after they are identified.

Exhibit A

UK Group

Enterprise Rent-A-Car European Holdings Limited

Enterprise Rent-A-Car UK Holdings Limited

Enterprise Rent-A-Car UK Limited

EAN Data Services UK Limited

ERAC UK Finance Limited

ARMS Business Solutions Limited

Common Automotive Platform Standard (CAPS) Consortium Limited

Bodyshop Management Solutions Limited

Gates Business Solutions Limited

Repair Funding Limited

City Car Club Limited

Burnt Tree Group Limited

Burnt Tree Holdings Limited

Burnt Tree Vehicle Solutions Limited

EHI Franchising (EMEA) Limited