

TAX STRATEGY

Tax Governance and Risk Management

The Group's objectives in managing and controlling its tax affairs and related tax risks are to ensure compliance with all applicable rules, legislation and regulations in the jurisdictions in which it operates, paying the correct amount of tax as it falls due. Tax risks are assessed when establishing operations in new markets and are monitored on an on-going basis for changes in legislation. Tax matters impacting the group are reviewed regularly by the Group's Chief Financial Officer and Tax Director, with support from external tax advisors where required.

We employ individuals with appropriate tax knowledge and experience to manage tax risks and to ensure compliance. The Group takes appropriate tax advice from reputable professional firms to ensure compliance with tax filing and payment obligations.

Attitude to Tax Planning

Tax, as a business expense, is managed like any other cost and the Group utilises legitimate tax incentives or opportunities for obtaining tax efficiencies in the course of managing its affairs. The Group only undertakes tax planning which is aligned with a genuine commercial rationale.

Tax Risk Appetite

Significant tax risks, implications arising from these risks and potential mitigating actions are considered by the Group when strategic decisions are taken – the tax risks of proposed transactions or new areas of business are fully considered with the support of our external tax advisers before proceeding.

We have a low appetite for tax risk, which can be defined as not undertaking any transactions involving tax that are not fully supported by commercial activities.

Working with HMRC

The Group maintains a co-operative relationship with the UK Tax Authorities to encourage an open relationship and hence to reduce our risk profile.

Where any tax law is unclear or subject to interpretation, we will engage with external tax advisers to ensure we remain compliant and to share our view with the tax authorities as applicable.

If faced with disagreement with the tax authorities, the Group would aim to resolve disputes in a timely manner through the provision of full and accurate responses to enquiries and maintaining an open and honest dialogue.

This tax strategy relates to the accounting year ended 31 December 2023 and has been prepared in accordance with Para 22(2), Schedule 19, Finance Act 2016.

The tax strategy above applies to each of the following entities:

- *Panattoni UK Developments Limited*
- *PDC UK 9 Limited*
- *PDC UK 10 Limited – the company was inactive as at 31 December 2023*