

Vital Holdings Limited Tax Strategy

This document, approved by the board of Vital Holdings Limited, sets out the Group's approach to conducting its tax affairs and dealing with tax risks for the year ending 30th June 2026.

Vital Holdings Limited regards the publication of this Tax Strategy as complying with its duty under section 161 and paragraph 16 (2) of schedule 19 Finance Act 2016, to publish its UK tax strategy for the year ending 30th June 2026.

As the ultimate holding company of the Group, we confirm that this strategy will apply to the following companies:

- Vital Holdings Limited
- Vital Energi Midco PLC
- Vital Energi Utilities Limited
- Vital Energi Solutions Limited
- Vital Energi Drakelow Limited
- Vital Energi Generation Limited
- Vital Community Energi Limited
- H2010 ESCo Limited
- The Movement ESCo Limited
- Paintworks ESCo Limited
- Vital Energi Trustee Limited
- Vital Holdings Investments Limited
- Vital SGN Investments Limited
- Vital Chiltern Investments Limited
- Eco Park Developments Limited
- Plumstead West Thamesmead ESCO Limited
- Hepworth Place Esco Limited
- Lewisham ESCO Limited
- Seaham Garden Village ESCO Limited
- CEF&NHM ESCo Limited
- Vital Energi (Bilsthorpe) Limited
- Vital Energi Power Networks Limited
- Vital Low Carbon Solutions Limited
- Vital Future Software Limited
- Vital Thermotech Limited
- Vital Energi (Port Clarence) Limited
- CEP Teesside Biomass Limited
- Edmonstone Esco Limited
- Monier Road Esco Limited

Approach to risk management and governance arrangements in relation to UK taxation, including tax risk appetite

The Group is a responsible taxpayer that aims to comply with all relevant tax laws and regulations, meaning that we seek to have a constructive and open relationship with HMRC and will pay the right amount of tax in the right place at the right time.

We recognise that, with ever-increasing complexity in legislation, this requires a pro-active approach to tax management to control and manage ongoing risks and opportunities.

We maintain adequate financial systems, processes, and control to ensure tax relevant data is collected for tax reporting.

The Board is responsible for determining our approach to tax with Cécile Parker FCCA IFR, Chief Financial Officer, having specific responsibility for tax matters, including as the nominated Senior Accounting Officer. She also has day-to-day operational responsibility for our tax affairs with support from the Company's Group Financial Controller, HR and the Finance team.

The advice of qualified external tax advisers is sought in situations where the application of tax legislation is unclear, or where it is apparent that there is a knowledge or resource gap. All external tax advice received is reviewed by the Group Financial Controller for its compliance with the tax risk appetite, and all tax advice is discussed and agreed with the CFO.

Tax planning

The Group is a socially and environmentally responsible organisation, as set out in our Corporate Social Responsibility policy and we see responsible administration and payment of taxation as part of that responsibility.

The Group does not engage in aggressive or abusive tax avoidance but recognises the obligation to its shareholders to structure its affairs in an efficient manner and therefore we will consider the tax consequences of transactions as a factor in the planning process.

We will make use of tax reliefs which are intended to apply to the commercial activities we undertake, and external tax advisers are utilised, when needed, for both tax compliance and tax risk management purposes.

Professional advice is sought on a transactional basis for matters requiring technical guidance or opinion, with the depth of such advice driven by our assessment of the risk presented by each opportunity.

Relationship with HM Revenue & Customs (HMRC)

The Group is committed to an open and transparent relationship with HMRC and to date communication with HMRC is focussed on timely tax compliance, for example meeting relevant filing and payment deadlines for taxes the company pays.

We engage the services of professional tax advisers to act as our agents, and they may liaise with HMRC on our behalf. This is seen by the Board as a way to ensure we get the most out of our relationship with HMRC, thus reducing our tax risk.

Where issues arise, these are communicated to HMRC in a timely manner and, in the rare event that errors are identified in any UK tax filings, HMRC are made aware of these without undue delay

Board Oversight and Ownership

This tax strategy document is aligned to our approach as a responsible taxpayer and is approved and owned by the Board.

Ian Whitelock



Chief Executive Officer