



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 30 June 2027.

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 30 June 2027.

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
- Heat Networks Development Company No.1 Limited
- Plymouth Project Company No.1 Limited
- Birkenhead Project Company No.1 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 the Chief Financial Officer (CFO), having specific responsibility for tax matters, including as the nominated Senior Accounting Officer (SAO). The CFO has day-to-day operational responsibility for our tax affairs supported by Group Finance Director, HR and the Finance teams.

The Group maintains a low appetite for tax risk and seeks to minimise the likelihood of tax disputes. We proactively manage our tax affairs to ensure full compliance with statutory obligations. 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. However, we recognise our obligation to our shareholders to structure our commercial affairs in an efficient manner, and we will therefore consider the tax consequences of transactions as a factor in our standard business planning process.

We will make use of legitimate tax reliefs and incentives which are intended by legislation to apply to the commercial activities we undertake. 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 formal opinion, with the depth of such advice driven by our assessment of the complexity and risk presented by each opportunity.

Relationship with HM Revenue & Customs (HMRC)

The Group is committed to an open, honest, and transparent relationship with HMRC. To date, our communication with HMRC is focused on timely tax compliance, such as consistently meeting relevant filing and payment deadlines for all taxes the company owes.

We engage the services of professional tax advisers to act as our agents, and they may liaise with HMRC on our behalf. This is viewed by the Board as an effective way to ensure we optimise our relationship with HMRC and mitigate overall tax risk.

Where tax issues or complexities arise, these are communicated to HMRC in a timely manner. In the rare event that errors are identified in any UK tax filings, we ensure that 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