

Introduction

Our tax strategy aligned with our overall business strategy. By adhering to the following principles, we ensure that we contribute positively to the UK, while fulfilling our obligations as a responsible company. We are committed to maintaining transparency, compliance, and responsible conduct in all our tax matters.

Overall Tax Policy

Adura will operate with integrity and transparency in all tax matters. We aim to ensure that our tax practices align with our business objectives, fostering trust with stakeholders and regulatory authorities.

The key objectives of our tax policy include:

- **Transparency:** We are committed to conducting our business activities in a transparent manner, facilitating accountability and trust. This includes providing details of our tax and other contributions to society, in line with the UK Payment to Governments regulations, as well as other transparency regimes.
- **Compliance:** We comply with UK tax legislation, and that of any other jurisdictions in which we operate. We only seek to use structures that are aligned with business activity and economic substance, such that our tax payments reflect the economic value generated.
- **Stakeholder Engagement:** We actively engage with stakeholders, including HMRC and industry bodies, to foster constructive relationships and ensure compliance.

Responsible Corporate Citizenship

Adura is committed to:

- **Paying Taxes:** We pay all taxes when and where legally due.
- **Timely Payment:** We prioritise the correct and timely payment of all taxes due, seeking to maintain compliance and avoid penalties.
- **Monitoring Systems:** We implement robust monitoring systems to ensure adherence to all relevant tax legislation.
- **Claiming Reliefs and Incentives:** We pursue available tax reliefs and incentives in accordance with the law, where they are aligned with our business and operational objectives.
- **Managing Risks:** We proactively identify and manage tax risks and disputes, employing a structured approach to mitigate potential tax issues.

- **Full Disclosure:** We commit to making full disclosures to tax authorities as required, fostering transparency and trust.
- **Preventing Tax Evasion:** We do not tolerate any facilitation of tax evasion by people who work for or on behalf of Adura.
- **Responsible Tax Arrangements:** We will not engage in arrangements whose sole purpose is to create a tax benefit more than which is reasonably understood to be intended by relevant tax rules.

Tax Compliance

Tax compliance is a fundamental part of being a responsible corporate citizen. We ensure compliance with tax rules and regulations by:

- **Accurate Filing:** We prioritise timely and accurate filing of tax returns, employing qualified personnel to oversee this process. Where tax law is unclear or subject to interpretation, we evaluate whether our position is more likely than not to be upheld and, where appropriate, seek an external opinion.
- **Documentation:** We maintain a well-organised documentation system with strict archiving rules, ensuring that all necessary records are readily accessible when needed.
- **Handling Correspondence:** We actively manage tax correspondence and disputes with HMRC and other tax authorities, ensuring that all communications are handled professionally and promptly.
- **Resolving Uncertainty:** We seek to resolve any uncertainty in the interpretation of tax laws directly with tax authorities, including through advance tax agreements. We also seek a co-operative compliance approach, which involves regularly and proactively engaging with tax authorities.

Internal Controls and Procedures

We have established internal controls and procedures that include:

- **Regular Training:** We provide ongoing training for employees involved in tax matters to ensure they are informed about current tax laws and compliance requirements.
- **Audit Functions:** We conduct periodic internal audits to assess compliance with tax regulations and identify areas for improvement.
- **Third-Party Consultations:** We engage with external tax advisors to obtain expert guidance on complex tax issues and to ensure that our practices align with industry standards.

Tax Planning

We are focused on ensuring that all structures have commercial substance and are aligned with our business activities. Key principles include:

- **Alignment with strategy:** All tax planning is based on genuine business activities, avoiding contrived or artificial arrangements.
- **Risk Evaluation:** We conduct thorough evaluations of all risk elements connected to tax planning, ensuring that associated risks are understood and managed.
- **Open Dealings:** We maintain open and honest dealings with tax authorities, fostering a cooperative relationship that benefits both parties.
- **Full Disclosure:** Given the complex tax environment in which we operate, it is possible to have a different interpretation of law to the tax authorities. Where this is the case, full disclosure of relevant facts and circumstances is made to the appropriate tax authority, maintaining transparency.

Governance and Oversight

This tax strategy is approved and overseen at the Board level of Adura. It applies to all subsidiaries and entities within the group. The publication of this strategy satisfies the statutory obligation under the UK Finance Act 2016 and represents our tax strategy for the year ending 31 December 2026. It will remain in effect until any amendments are approved by the Board of Directors.

Review and Amendment Process

We regularly review our tax strategy to ensure it remains relevant and effective. This process includes:

- **Annual Reviews:** Our tax strategy is reviewed annually to assess its effectiveness and alignment with our business objectives.
- **Stakeholder Feedback:** We seek feedback from key stakeholders, including employees and tax advisors, to identify areas for improvement.
- **Regulatory Changes:** We monitor changes in tax legislation and regulations to ensure our strategy remains compliant and aligned with best practices.