

ABP (Jersey) Limited and its subsidiaries – Tax Strategy

Financial year ending 31 December 2025

- **Tax risk management** – Day to day responsibility for this area is delegated by the Board to the Chief Financial Officer working with the Group Treasurer and Group Tax Manager. Given the scale of our business and volume of tax obligations, tax risks will inevitably arise from time to time in relation to the interpretation of tax law and nature of our compliance arrangements. In line with the Group's risk management approach, we proactively seek to identify, evaluate, manage and monitor tax risks to ensure they remain in line with the group's low risk appetite. ABP takes a conservative approach to tax risk management. In the event tax decisions deviate from day to day compliance activities they are referred to the Board and where there is significant uncertainty or complexity in relation to a tax risk, external advice is sought.
- **Compliance** - We comply with tax law and practice in all of the territories in which we operate, including the UK which is our main place of business. Compliance for us means paying the right amount of tax in the right place at the right time and involves disclosing all relevant facts and circumstances to the tax authorities and claiming reliefs and incentives where available.
- **Planning** - In structuring our commercial activities we will consider – among other factors – the tax laws of the countries within which we operate with a view to maximising value on a sustainable basis for our shareholders.
- **Tax authority relationships** - We have an open and honest relationship with HMRC whose representatives we engage in a spirit of co-operative compliance. In doing so, ABP aims to avoid the potential for any future dispute. We are prepared to litigate where we disagree with a ruling or decision of a tax authority but will first seek to resolve any disputed matters through pro-active and transparent discussion and negotiation.

This strategy is approved, owned and overseen by the ABP (Jersey) Limited Board.

The group regards this publication as complying with its duty under Finance Act 2016 Schedule 19 paragraph 16(2) in the current financial year.