

UK TAX STRATEGY

This UK Tax Strategy is relevant for the period ended 30 April 2025 and is published in accordance with Schedule 19 of the Finance Act 2016 and applies to all of BJSS Group's UK companies, which are listed at the end of this document. It will be reviewed and updated annually and applies to all direct and indirect taxes listed in paragraph 15 (1) of Schedule 19 of the Finance Act 2016, including income tax, corporate tax, VAT, PAYE and National Insurance Contributions.

Overview

The BJSS Group commits to the following key tax principles;

- To effectively manage tax risk through a robust governance and control framework.
- To ensure compliance with our tax obligations and payment of the right amount of tax at the right time.
- To develop and maintain an open and honest relationship with HMRC.

1. Our Approach & Commitment to Tax Risk Management & Governance

Ultimate responsibility for the Group's tax strategy and compliance sits with the Board of Directors. Executive management of the tax affairs of the Group is delegated to the Commercial & Financial Director (C&FD) who also acts as the Senior Accounting Officer for the BJSS UK companies. The C&FD is supported by a team of appropriately qualified individuals who work alongside our external tax advisers to ensure compliance with our UK tax obligations. The C&FD reports to the Board on tax matters as appropriate.

The BJSS tax risk management framework operates a process of tax risk assessment which are supported by reasonable and practicable internal controls, procedures, processes and systems to ensure risk mitigation actions conducted are compliant with relevant UK

legislation and case law.

Reviews, testing and monitoring relating to our tax risk management are conducted on a regular basis to ensure that the actions undertaken are current, appropriate and take into account any recent change in legislation. This ensures that reasonable care is applied in relation to our tax processes which, if not managed adequately, could have a material impact on compliance with its tax obligations.

We are committed to ensuring full compliance with our tax obligations and paying the right amount of tax at the right time. In addition, BJSS adheres to the Organisation for Economic Cooperation and Development's (OECD's) guidelines on transfer pricing and our transfer pricing policies, which are applied consistently between our individual overseas group companies and BJSS Limited, are reviewed and updated on a regular basis.

We take a prudent approach in considering the tax outcomes of our various commercial transactions, including respecting the spirit of any laws or regulations, recognising that tax laws are complicated and may be open to multiple interpretations.

BJSS takes advice from independent external tax, legal and accounting firms to ensure that our risk management decisions are based upon the latest and most relevant interpretations of laws and regulations.

2. Our Attitude to Tax Planning

All tax planning undertaken by the group is aligned to commercial activity.

BJSS assesses the tax risks and analyses different tax outcomes that may arise from its commercial operations. Where there is uncertainty as to the application or interpretation of tax legislation, we will obtain the necessary external advice and, where necessary, approach HMRC for advice and guidance to support the assessment of the tax risks and outcomes.

UK TAX STRATEGY (CONTINUED)

3. Our Tax Risk Appetite

BJSS operates a low-risk (risk-averse) approach to how we treat and manage our tax planning and affairs. This is achieved by ensuring compliance with HMRC's & OECD's tax regulations and guidelines and practising prudence and care with our tax treatment and management decisions. Where high and unusual tax risks are identified, we will mitigate and manage those risks accordingly.

4. Our Commitment to an Open Relationship with HMRC

BJSS is committed to maintaining an open and collaborative relationship with the tax authorities in the jurisdictions in which we operate.

We commit to inform HMRC as soon as possible upon identifying any errors, taking actions to resolve such errors, and ensuring similar errors do not occur going forward. We also provide timely responses to HMRC information requests and enquiries to ensure that issues are resolved quickly.

BJSS are committed to timely submission of accurate tax computations and returns in compliance with all tax laws and regulations in the UK and elsewhere.

Appendix 1: BJSS Group Legal Entities in the United Kingdom

BJSS Group Legal Entities in the UK:

- > BJSS Limited
- > BJSS Environmental Limited