



## **Techtronic Industries Tax Policy for the Financial Year Ending 31 December 2023**

This statement sets forth the operating tax policy of the UK entities of the Techtronic Industries Company Ltd Group (“TTI”, “TTI Group”). This policy complies with Part 2 of Schedule 19 FA 2016, and the UK tax strategy publication requirement set out therein.

### **Tax Strategy**

TTI is committed to conducting its business in accordance with all applicable UK tax laws and regulations, and the UK tax strategy is developed and applied in accordance with this principle.

### **Tax Risk Management**

TTI monitors its UK tax risks and manages those risks through a combination of its in-house UK Tax Department professionals, and, where applicable, through the retention of external tax advisors, e.g. to assist with UK tax filings or to provide UK tax consultation. Ultimately all UK tax risk is reviewed by senior TTI Global Tax Department management at corporate headquarters. The TTI Global Tax Department periodically updates the Board on the Group’s tax posture, which includes the UK.

TTI prepares, on an annual basis, contemporaneous transfer pricing documentation to actively monitor and ensure that transactions with other non UK TTI Group companies are conducted on an arm’s length basis.

### **Level of Tax Risk**

TTI’s UK tax policy is to follow the arm’s length principle in respect of all intercompany transactions within the TTI Group in line with the laws of the UK and the OECD Transfer Pricing Guidelines, which we believe allows us to operate at a minimal level of tax risk.

### **Attitude to Tax Planning**

TTI’s attitude towards structuring its affairs and tax planning is to do so based on sound commercial purposes consistent with the UK business fundamentals of the TTI Group and in compliance with the tax laws of the UK.

TTI may seek external tax advice where assistance is required on interpretation of complex tax law.

All TTI employees are bound by the TTI Code of Ethics and Business Conduct.

### **Engagement with Tax Authorities**

TTI proactively seeks to engage in discussion with HMRC (either informally or through formal legal procedures such as Mutual Agreement Procedures) on tax events or interpretation of tax law where there may be significant uncertainty. TTI also ensures that all compliance requirements with HMRC are met in order to minimise tax risks.