
Corio Group Tax Strategy

1. Background

Corio Generation Limited is required to comply with duties under paragraph 19(2) and paragraph 22(2) of Schedule 19 of the Finance Act 2016 to publish a UK tax strategy for the financial year ended 31 March 2024. As an operationally segregated subsidiary (OSS) of Macquarie Group Limited, Corio Generation Limited has elected to publish its own tax strategy. This tax strategy applies to Corio Generation Limited and its subsidiaries for the financial year 31 March 2024. Corio's approach to tax is outlined below.

2. Tax risk management and governance

Tax risk is recognised as a material risk. A failure to comply with applicable tax laws, regulations or rulings or a failure to meet other Tax Authority requirements or expectations can result in significant adverse financial or non-financial impacts.

Tax risk includes any event, action or inaction in tax strategy, operations, financial reporting or compliance that has the potential to either adversely affect Corio's tax or business objectives or result in an unanticipated or unacceptable levels of monetary, financial statement or reputational loss or exposure.

Tax risks can take a number of different forms (e.g. the risk of breach of statutory obligations, tax withholding or payment failure, misinterpretation or misapplication of tax law or a tax filing or reporting failure) and are an inherent part of Corio's ordinary business operations.

These risks can be material and have the potential to extend beyond relationships with Tax Authorities, negatively impacting Corio's and its business performance, as well as our broader relationships with counterparties, suppliers and markets in which we operate.

Our intention is that Corio's reputation as a responsible taxpayer should be protected and the confidence of our stakeholders maintained. We are therefore dedicated to complying with all statutory obligations and providing full disclosure to the tax authorities. We believe that tax compliance involves paying the correct amount of tax at the right time as well as disclosing all relevant information to the tax authorities.

The Board of Directors, as well as Chief Financial Officer and the Head of Tax have the responsibility for ensuring that Corio follows the correct application and compliance with tax legislation.

To minimise the risk of error and ensure that taxes are calculated and paid correctly, we have implemented robust policies and procedures to identify, assess, control and report tax risks. These policies and procedures are regularly monitored and updated, and our employees receive the appropriate training and professional support. Specifically, Corio implements Financial Controls Standards for Tax Management which is our internal control framework that documents our processes and controls covering all taxes relevant to Corio.

We have zero tolerance for the facilitation of tax evasion by anyone acting for or on behalf of the Corio Group and we have robust procedures in place to identify and mitigate any risk of tax evasion facilitation.

An annual review of the tax processes, procedures and internal controls is undertaken to comply with the legal requirement to file a Senior Accounting Officer Certificate.

3. Approach to tax planning

Our approach to tax planning is based on responsible business practices. We will seek to make use of available tax incentives and reliefs in line with, and in the spirit of, tax legislation, but we do not engage in tax planning that is unconnected to our commercial activities. We will not undertake transactions solely for the purpose of creating a tax benefit that goes beyond what is intended by the relevant tax rules. Moreover, Corio will not finance, or in any way support

transactions where the objective of any of the parties might reasonably be expected to be the obtaining of a dividend withholding tax benefit.

We do not use tax havens for the purpose of avoiding taxes. If we establish entities in low- or nil-rate jurisdictions, it will be for substantive and commercial reasons, such as the desire to expand commercial operations into new territories. This means that we pay taxes on profits according to where value is created within the normal course of commercial activity, and we do not use artificial structures or contracts to avoid establishing a taxable presence in jurisdictions where we do business.

4. Attitude towards tax risk

Corio aims for certainty in relation to the tax treatments of all items but acknowledges that this will not always be possible for instance where transactions are complex or the jurisdiction in which the Group operates has a tax regime which is new or untested. In these cases, the Board of Directors, CFO and Head of Tax are responsible for identifying and managing tax risks, taking into consideration the materiality of the amounts involved. The acceptable level of risk is determined on a case-by-case basis and external guidance may be sought from professional advisors and tax authorities where needed.

5. Transfer pricing

Corio will follow the principles of the Organization for Economic Cooperation and Development's Transfer Pricing framework and set transfer prices for intercompany transactions based on the arm's length principle. We will analyse the functions, assets, and risks of each company within the group considering the substance of their business activities, and periodically evaluate whether the profit allocation is appropriate in line with the contribution of each company.

We will prepare transfer pricing documentation in accordance with the relevant transfer pricing regulations in each jurisdiction.

6. Relations with authorities

We seek wherever possible to develop cooperative relationships with HMRC and other tax authorities globally.

We are committed to addressing any tax enquiries or audits promptly and resolving these in an open, transparent and constructive manner.

All tax returns will be submitted by the appropriate deadlines and any information requests will be responded to in a timely manner.

7. Industry groups

The business will participate in relevant industry forums and consultation processes as appropriate to ensure Corio is engaged with current tax issues and developments.

Last review: March 2024

Policy owner: Head of Tax

Policy approver: Corio Board