

TAX STRATEGY

For the financial year ending 31 March 2026

(Approved by the Board on 27 March 2026)

1. Introduction

This tax strategy sets out the strategic tax objectives of the Company and its subsidiaries (the “Group”) for the financial year ending 31 March 2026. It is published in accordance with Paragraph 16, Schedule 19, Finance Act 2016 and applies from the date of publication until it is superseded.

This document is not an operational manual. The processes and controls supporting the delivery of our tax objectives are operated by the finance team in accordance with the Group’s governance framework and are reviewed periodically to ensure they remain appropriate.

1.1 Scope

The tax strategy and strategic objectives apply to the Group but not specifically to the Group’s joint venture arrangements.

As a UK REIT, the Group is exempt from corporation tax on net rental income and UK property gains but is required to distribute at least 90% of its rental profits as Property Income Distributions (PIDs). PIDs are taxed as rental income in the hands of shareholders according to their tax status. Corporation tax remains chargeable on net rental income and property gains relating to non-UK property.

This strategy applies to all relevant tax matters, including:

- REIT compliance
- Corporate income taxes
- Indirect taxes (VAT, SDLT)
- Employment taxes (PAYE/NIC/CIS)
- Other taxes where applicable

While the strategy primarily covers the UK tax affairs of the Group, it also applies, where relevant, to the Group’s wider corporate structure.

The Group’s structure is almost entirely UK-based, with all entities UK tax-resident except for a small number of legacy Jersey trusts inherited mainly through the LXi acquisition, which cannot be collapsed but are overseen under the same UK tax governance framework. The Group also holds a single German property, for which PwC provides German tax compliance support. All other tax matters across the Group’s pre-existing structure and those acquired through LXi, Highcroft Investments and Urban Logistics REIT are managed centrally by the UK finance team.

Our approach to tax is informed by the broader policy objectives of the UK REIT regime, which emphasise transparency, responsible governance and alignment between commercial activities and tax outcomes. These principles help guide how we manage tax risk, structure transactions and engage with stakeholders.

1.2 Ownership and approval

This tax strategy is prepared by the Chief Financial Officer (CFO) with input from the finance team and is reviewed and approved by the Board. It is reviewed at least annually, or more frequently where changes in tax law, Group structure or operations require.

2. Tax strategy and strategic objectives

2.1 Strategic principles

The Group is a UK REIT and invests in property assets to deliver sustainable, progressive earnings and long-term capital value for shareholders.

We view responsible tax conduct as an integral part of our broader governance and sustainability commitments.

Tax is a consequence of the activities the Group undertakes, and tax considerations are integrated into commercial decision-making in a way that supports long-term value creation while remaining compliant with UK tax law and the REIT regime.

2.2 Attitude to tax risk and tax planning

The Group's approach is low-risk and compliance-oriented. The Group:

- Meets all tax filing and payment obligations accurately and on time
- Maintains a conservative approach to tax planning
- Structures its affairs based on sound commercial principles and genuine economic activity
- Does **not** engage in aggressive tax planning
- Seeks clarification or clearance from HMRC where tax treatment is uncertain

The Group maintains an open, transparent and proactive relationship with HMRC. The Group was designated a "Low Risk" business by HMRC in July 2025, and it is the Group's objective to maintain this rating.

3. Governance and resources

3.1 Tax Governance Framework

The Group's tax governance framework is overseen by the Board. The Board receives regular updates on material tax matters, emerging legislation and tax-related risks. The Audit Committee provides further assurance through its annual review of the risk and internal control framework and reports its findings to the Board.

The Group operates a proportionate tax control environment with clearly defined responsibilities, established preparation and review processes, segregation of duties, and routine financial controls to ensure accurate and timely tax compliance. Tax risks are identified and escalated through regular

management oversight, with periodic assessment to confirm that the control environment remains appropriate for the scale and complexity of the Group.

The CFO has overall responsibility for execution of the tax strategy and acts as the Group's Senior Accounting Officer (SAO). The SAO annually certifies that the Group maintains appropriate tax accounting arrangements.

Day-to-day preparation of tax computations, returns and payments is undertaken by experienced senior finance staff. Responsibilities are clearly allocated with appropriate segregation between preparation and review.

Key tax controls are monitored and periodically assessed to ensure they remain effective.

3.2 Risk identification and management

The Group maintains a tax-specific risk register, most recently reviewed in March 2026. Tax risks are assessed with reference to:

- Commercial drivers
- Regulatory and legislative developments
- Operational changes
- Stakeholder and investor expectations
- HMRC insights

Significant tax matters are reported to the Board by the CFO, including legislative changes and potential tax exposures in significant transactions such as acquisitions, developments and disposals.

3.3 Training

Relevant members of the finance team are encouraged to undertake ongoing training and attend professional seminars to maintain up-to-date technical knowledge.

3.4 Use of professional advisers

Professional tax advice is sought where necessary for significant transactions, areas of uncertainty or compliance matters requiring specialist expertise (e.g., German tax compliance).

3.5 Change management

Changes in tax legislation or REIT regulatory requirements are monitored and incorporated into the Group's tax processes and risk reviews.

3.6 Document retention

Records relevant to REIT compliance, tax returns and supporting calculations are retained for at least the statutory period (typically six years).