



Techtronic Industries Tax Policy for the Financial Year Ending 31 December 2025

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. This Tax Policy is aligned with TTI’s Code of Ethics and Business Conduct and is approved by TTI’s senior management.

Tax Strategy

TTI is committed to conducting its business in accordance with all applicable laws of the UK and other jurisdictions where TTI operates, and the UK Tax Policy is developed and applied in accordance with this principle.

Tax Risk Management

Day to day operation of the UK tax function and governance of the UK tax risks lies with the in-house UK Tax Department professionals. Where applicable, TTI engages external tax advisors, e.g. to assist with UK tax filings or to provide UK tax consultation. The Senior Accounting Officer, Director of Financial Accounting EMEA, is responsible for the overall assessment and mitigation of UK tax risks. Ultimately, all UK tax risk is reviewed by TTI Global Tax Department at corporate headquarters in Hong Kong. The TTI Global Tax Department periodically updates the TTI Board of Directors 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 domestic (UK and other jurisdictions where TTI operates) and international laws as well as the OECD Transfer Pricing Guidelines and other latest guidance of the OECD/G20 Inclusive Framework on BEPS, which we believe allows TTI 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 purpose consistent with the UK business fundamentals of the TTI Group and in compliance with all applicable laws and regulations.

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 discussions with HMRC (either informally or through established legal processes such as a Mutual Agreement Procedure) in relation to significant transactions or interpretation of tax laws where there may be significant uncertainty. TTI ensures that it meets all compliance requirements with HMRC and makes tax payments on time in order to minimise its tax risk.