UK Group Tax Strategy

Millbrook Healthcare Holdings Limited and subsidiaries

Financial year ending: 30 June 2026

1. Introduction

This tax strategy applies to Millbrook Healthcare Holdings Limited and its UK subsidiaries (together, the "Group"). The Group comprises both UK holding companies and UK trading subsidiaries.

The Group operates in accordance with applicable UK laws and regulations and seeks to maintain high standards of tax compliance and governance. This tax strategy is published in accordance with Part 2 of Schedule 19 to the Finance Act 2016, where applicable, and describes the Group's approach to UK taxation. The strategy is reviewed by the Board at least annually.

2. Group tax governance and responsibility

The Board has overall responsibility for the Group's tax strategy and tax governance. Responsibility for day-to-day management of the Group's tax affairs is delegated to the Chief Financial Officer, supported where appropriate by suitably qualified internal personnel and external professional advisers.

The Group's tax governance framework is designed to:

- ensure that tax returns, payments and other statutory obligations are completed accurately and on time;
- ensure that tax consequences are considered when significant commercial decisions are made;
- obtain appropriate professional advice where tax matters are complex or uncertain;
- maintain appropriate records and documentation; and
- ensure that material tax risks and uncertainties are escalated to senior management and, where appropriate, the Board.

3. Management of UK taxes

The Group's principal UK taxes include:

- Corporation Tax;
- Value Added Tax;
- employment-related taxes;
- business rates and other local taxes;
- Stamp Duty Land Tax and Stamp Duty;
- customs and import/export duties;
- Construction Industry Scheme obligations;
- withholding taxes; and
- other taxes, duties and reporting obligations applicable to the Group.

4. Tax planning and approach to tax risk
The Group's approach to tax planning is to support its genuine commercial activities while complying with the law. The Group is entitled to take account of available tax reliefs, exemptions, allowances and incentives that Parliament has made available to businesses. Where appropriate, the Group may structure commercial transactions in a tax-efficient manner, provided that the arrangements are consistent with the Group's commercial objectives and applicable legislation. The Group's risk appetite does not prevent it from making legitimate use of statutory tax reliefs and incentives or from structuring its affairs efficiently within the law.

The Group does not undertake tax planning for the sole purpose of obtaining an artificial tax advantage where the arrangements lack a genuine commercial purpose. The Group does not tolerate deliberate tax evasion or the facilitation of tax evasion.

The Group's objective is to pay the correct amount of tax at the correct time and to comply with applicable tax laws and reporting requirements.

5. Holding company and trading subsidiaries
Where transactions between Group companies have tax implications, the Group considers the relevant UK tax legislation, including applicable transfer pricing and anti-avoidance provisions. The Group does not use its corporate structure for the purpose of creating artificial tax outcomes that are disconnected from its underlying commercial activities.

6. International taxation
To the extent that the Group undertakes transactions with entities outside the UK or otherwise has international tax obligations, it seeks to comply with the relevant UK and overseas tax requirements.

7. Relationship with HMRC
The Group seeks to maintain an open, professional and constructive relationship with HMRC.

8. Tax compliance
The Group seeks to meet all applicable filing and payment deadlines. Tax compliance processes are designed to ensure that relevant returns, elections, claims, notifications and payments are reviewed and submitted within the applicable statutory deadlines.

The Group maintains appropriate records to support its tax positions and claims.

Approved by the Board of Directors and signed on its behalf:

Tim Jones, Chief Financial Officer
Date: 13 October 2026