

UK TAX STRATEGY

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Introduction

This tax strategy statement is published by UK Mainstream Renewable Power Limited on behalf of its UK affiliates as set out in Appendix 1 (collectively “Mainstream UK”) in compliance with its obligations under Paragraph 19(2) and 22(2) Schedule 19 Finance Act 2016. It is effective for the financial year ended 31 December 2022 and will be reviewed on an annual basis thereafter and updated as necessary.

This statement documents the UK tax strategy of Mainstream UK, its approach to tax risk management, tax planning and its relationship with HMRC.

Approach to tax risk management and governance

Mainstream UK seeks to achieve full compliance with all its UK tax obligations.

Responsibility for tax matters for Mainstream UK primarily rests with the Mainstream Group tax team, all members of which have appropriate tax qualifications and experience. The Mainstream Group tax team is supported where necessary by professional tax advisors.

Where potential tax risks are identified or there is uncertainty in relation to the interpretation or application of UK tax law, professional advice is sought from external tax advisors to support the decision-making process.

Level of tax risk that Mainstream UK is prepared to accept

Mainstream UK is averse to tax risks and seeks to continually improve internal tax risk management processes and controls to minimise all tax risks across the Group.

Attitude to tax planning

Mainstream UK is focused on tax efficiency and utilising tax reliefs available to it in accordance with UK tax legislation. Mainstream UK will not undertake transactions with the primary purpose of avoiding UK taxes or transactions which are not aligned with commercial reality.

Mainstream UK engages the services of professional tax advisors to assist with all major or complex business decisions to fully understand any associated tax risks.

Relationship with HMRC

Mainstream UK seeks to meet the highest standards of professional care with regards to its UK taxes. It is committed to maintaining a good relationship with HMRC and working with them in an open, transparent, and collaborative manner.

For further information relating to this Policy, please contact the following individuals:

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Approved by the Board of Directors of UK Mainstream Renewable Power Limited on behalf of itself and its UK tax resident subsidiaries and affiliates, in accordance with paragraphs 19(2) and 22(2) Schedule 19 Finance Act 2016

Appendix 1:

Mainstream’s business activities in the UK are conducted through the following UK established entities (collectively “Mainstream UK”):

- UK Mainstream Renewable Power Limited
- Aker Offshore Wind Limited
- Dubh Artach Holdings Limited
- Dubh Artach Offshore Wind Limited