



Tax Strategy

We regard this document as complying with the requirement to publish a UK tax strategy for the year ending 31 December 2025 in accordance with Schedule 19, paragraphs 19(2) and 20 of the Finance Act 2016. This document has been reviewed and approved by a board resolution on 24 April 2025.

Introduction

VPI is a leading power company. VPI's role is to anticipate challenges that emerge as the energy transition unfolds, and then to act to tackle them. In the UK, it owns 3.3GW of flexible and reliable power generation capacity and it is the largest battery storage operator in Ireland.

The company's portfolio is growing, with two projects under construction. Development projects include one of the world's largest carbon capture power projects, which could help kickstart the abatement of the UK's most emissions-intensive industrial cluster. VPI has also recently announced expansion into Germany via a joint venture to develop battery storage.

Compliance and Reporting

VPI strives to operate responsibly and comply with UK tax law and operate in an open and transparent manner with taxation authorities. VPI will seek to minimise the risk of uncertainty or unnecessary disputes. In non-UK jurisdictions VPI will apply the same standard, subject to any additional requirements of local tax laws.

Risk management and Governance

VPI aim to ensure that all personnel with tax responsibilities, or whose business activities may have a tax impact, have a consistent understanding of how tax risks are identified, assessed, reported and managed. A tax risk register is maintained to record and monitor how the business evaluates and mitigates these risks.

Those responsible for tax matters regularly liaise with business units to discuss commercial activities and related tax matters.

Staff responsible for processing tax matters are suitably qualified, have regular training and maintain procedures to perform their functions correctly and diligently. These procedures include multiple review and approvals at an appropriate level. VPI staff seek professional guidance from external advisers who are regularly engaged to review the work undertaken by internal staff and assist with the preparation of tax filings where needed.

VPI seeks to adopt policies to ensure that we comply with all relevant national and international legislation and regulations. These policies and their implementation are overseen by the relevant business function, which communicates and confers with the leadership team and board as required.

Overall, key tax matters are discussed with the VPI Group's top management team on a recurring basis given the Board's understanding that tax is an important business risk area to be monitored and managed.



Taxation Planning

VPI will engage in tax planning that is aligned with its commercial and economic activity. This means that tax decisions are made in response to commercial activity, and are aligned to make use of reliefs which are intended to apply to the commercial activity VPI undertakes.

VPI will seek to use legitimate tax incentives and exemptions designed by governments to promote investment, employment and economic growth in the manner intended.

Level of Risk

In line with our Code of Business Conduct and Ethics our primary objective is to apply the law correctly to all our transactions and, in so doing, minimise tax risk. Many factors will be considered as part of any tax arrangement or filing, these include reputational, fiduciary and commercial impacts. In the case of uncertainty VPI will seek professional advice in relation to taxation affairs.

Taxation Authorities

As we are a UK headquartered business our principal interactions are with the UK tax authorities, being HM Revenue and Customs (HMRC). VPI will seek constructive and respectful relationships with HMRC and other taxation authorities, and work collaboratively to resolve any disputes and to achieve agreement and certainty, wherever possible.