

Scope

This strategy applies to Galliford Try Holdings plc (the “Company”) and its subsidiaries (together the “Group”). This Tax Strategy is published to satisfy the UK legislative requirements of paragraph 16(2) of Schedule 19 of the Finance Act 2016. It has been approved by the Board and applies to the financial year ended 30 June 2025 and thereafter, until superseded.

References to “tax” are to UK taxes and duties set out in paragraph 15(1) of Schedule 19 of the Finance Act 2016, and includes Income Tax, Corporation Tax, PAYE, National Insurance, VAT, Insurance Premium Tax and Stamp Duty Land Tax. The Group will comply with HMRC rules when procuring goods or services from outside the UK.

Aim

The Group’s aim is to meet all legal requirements, by filing all appropriate tax returns and making tax payments accurately and on time. We will also look to maximise shareholder value and protect our reputation and brand. This aligns with the Group’s broader corporate strategy.

Our approach to tax governance and tax risk management

Overall responsibility for the Group’s tax affairs including application of our tax strategy rests with the plc Board which delegates executive responsibility for tax to the Chief Financial Officer who is also the Group’s Senior Accounting Officer.

This strategy is agreed by the Executive Board with management of tax led by the Head of Tax, supported by other members of the Finance function, all of whom are appropriately qualified.

The Chief Financial Officer and Executive Board receive updates in respect of all material tax matters and ensure that tax is considered when making significant business decisions. The Audit Committee monitors the integrity of the Group’s financial reporting system, internal controls and risk management framework, including those elements in relation to tax.

Tax risks can arise from uncertainties in the interpretation of laws and regulations that are relevant to commercial transactions carried out by the Group, or through changes in the structure or operations of the Group. The Group proactively looks to identify these and mitigate these risks appropriately by engaging with external tax advisers for assistance where necessary.

Our attitude towards tax planning

We undertake transactions that are commercially driven and do not put in place artificial or contrived arrangements that could give rise to reputational damage to the Group.

We recognise our responsibilities to our stakeholders including customers, employees, subcontractors, suppliers, joint venture partners, the communities in which we work, our shareholders and HM Revenue & Customs. Our Tax Strategy seeks to balance these interests while remaining compliant with all laws and regulations.

We will look to maximise available tax reliefs such as Research and Development Tax Credits to the extent possible and provided they are aligned to the commercial activities of the Group.

Our appetite to tax risk

Tax outcomes are considered together with other factors as part of any commercial business decisions. Once a business decision has been made, the most tax efficient treatment will be applied that is consistent with both the letter and what we consider to be the spirit of the law. The Chief Financial Officer and where required, the Head of Tax or other members of the finance function are involved in relevant business decisions to ensure that any tax risk is properly considered.

Our appetite to tax risk is low and therefore where a business transaction presents any tax uncertainty, we will raise the uncertainty with HMRC with a view to obtaining clarity on the tax position and obtain certainty wherever possible.

Where agreement on areas of uncertainty cannot be reached with HMRC we will always look to work collaboratively with HMRC to try to reach a conclusion. On rare occasions, where this is not possible, the Head of Tax in collaboration with the Chief Financial Officer, will make a recommendation to the Executive Board as to the appropriate means of resolving a particular technical point.

Our approach to dealing with HMRC

The Group maintains a transparent relationship with HMRC based upon open and timely communication, with the Group having a 'Low Risk' HMRC Business Risk Review (BRR+) rating. The Chief Financial Officer, the Head of Tax, or other members of the finance function proactively engage with HMRC on matters of uncertainty and other matters where appropriate, using the assistance of external tax advisors where necessary, to ensure that HMRC is advised of significant transactions or other issues in order that a resolution can be achieved collaboratively.

We aim to respond promptly to any enquiries or requests for further information from HMRC to facilitate a prompt resolution of tax matters. For example, this may include facilitating meetings or providing documents such as our policies and procedures. Where any inadvertent errors in submitted tax filings are identified, we will make full and timely disclosures to HMRC to resolve the matter.

Wherever possible and appropriate, the Group will respond to and input into consultation documents issued by HMRC regarding proposed legislative changes to ensure that we provide our perspective and that we fully understand the potential impact on our business.

March 2025