

Tax Strategy Statement

This statement sets out the tax strategy for Clancy Group Holdings Limited and its group of companies (Clancy or we) as required by Schedule 19 of Finance Act 2016. The statement is effective for the year ending March 2027 and will be updated and reviewed annually.

Clancy Group Holdings Ltd and its group of companies has successfully grown over its 60-year history and prides itself on its family culture and its family values including trust, honesty and integrity. These values are applied to all areas of the business, including taxation matters. This tax strategy statement outlines Clancy's approach to conducting its tax affairs, accountability and governance, in addition to our attitude to tax planning, our approach to tax risk management and in working with HMRC.

The strategy applies to all taxes to which we are subject to, including corporation tax, business rates, Construction Industry Scheme Tax, indirect taxes (including VAT, Stamp Duty,), and employment taxes which are payable and reportable to HM Revenue & Customs ("HMRC"). We aim to be transparent and compliant in our tax affairs by meeting all of our tax obligations and responsibilities on time.

Responsibilities, accountability and governance

The Executive Board has ultimate responsibility for our tax strategy and our compliance to it. The day-to-day management of tax is delegated to our Finance Department. The department includes a number of professionally qualified Accountants who have many years of relevant experience and who are supported, (when required) by our external professional tax advisers. All taxation matters are overseen and reviewed by the Chief Financial Officer.

Our attitude to tax planning

We act responsibly in all tax matters and we strive to pay the right amount of tax, in the right place, at the right time. We aim to meet all of our statutory obligations, and to be open and transparent in our approach to taxation at all times and behave responsibly and proactively in our dealings with relevant tax authorities. We ensure compliance with reporting requirements and deadlines.

We apply relevant tax laws in a reasonable way and in the spirit they were intended, such as making use of the appropriate reliefs and exemptions permitted by legislation where available, however we will not establish structures or processes aimed solely at tax avoidance. In circumstances where tax planning might be considered, this will be done in conjunction with our external professional advisors, and where appropriate we will engage with HMRC.

Our approach to tax risk management and governance

As the business environment changes and our companies grow, we continually review our corporate governance arrangements including our tax strategy. We manage our tax risks through internal reviews of risk and controls, seeking advice from our external professional advisers (where appropriate) which ensures compliance with the Senior Accounting Officer regime. This in turn,



ensures that our Senior Accounting Officer can certify to HMRC on an annual basis that our tax accounting arrangements are appropriate.

We recognise that we are inevitably exposed to a level of tax risk. As part of our internal governance procedures and the Senior Accounting Officer requirements, we operate within a controlled framework. We internally challenge and test the effectiveness of our tax controls and use external audits to review our systems and processes to ensure that we minimise levels of tax risk. Our tax strategy is important in managing our reputation with the public, HMRC and our clients. We will not enter transactions or arrangements where the main purpose is the avoidance of tax.

To support Clancy in ensuring that we have interpreted tax law correctly (and in particular the implications of any changes in tax legislation), have understood the tax reliefs and exemptions available to us, or where there is significant uncertainty or complexity, we may seek advice from reputable external professional firms to ensure that we can remain compliant with HMRC taxation requirements.

Our relationship with Tax Authorities

We are open and transparent in our approach to taxation at all times and continue to behave responsibly and proactively in respect of all of our dealings with HMRC and we enjoy a positive working relationship with HMRC based on mutual trust and respect.

Due to the size of our business, we have a HMRC Customer Compliance Manager who is responsible for the relationship between Clancy and HMRC in respect of all taxes.

Where appropriate and achievable, we will undertake to engage with HMRC commissioners on a real time basis in any areas of uncertainty insofar as they relate to our tax affairs. We are committed to providing any information or documents requested by HMRC as quickly, transparently and as completely as possible. We acknowledge that it is important to invest in the appropriate systems and resources to achieve the increasing demands on business as legislation changes. We seek to resolve any issues with HMRC in a timely manner and our relationship with HMRC is extremely important to the success of our business.