

## Speira – UK Tax Strategy

### 1. Introduction

This tax strategy, approved by the Board of Speira Group, has been prepared in accordance with the requirements of Paragraph 16, Schedule 19, Finance Act 2016 and is published for the financial year ended 31 December 2024.

The tax strategy applies to the following entities of Speira group, which operate in the UK:

- Speira UK Limited
- Speira Recycling Services UK AcquireCo Limited
- Speira Recycling Services UK Holdco Limited

Speira is committed to full compliance with all statutory tax obligations and full disclosure to all tax authorities as required by law.

### 2. Governance in relation to UK taxation

All tax matters are managed by a central tax team in Germany. The central tax team reports to the Chief Financial Officer. Additional support with compliance and technical issues as well as ongoing updates on relevant UK tax and governance requirements are provided by external advisors as and when required.

### 3. Attitude to tax planning

Tax planning activities are limited to those that support Speira's business and reflect commercial and economic activity.

Speira do not undertake any tax planning unrelated to commercial transactions. No artificial or aggressive tax planning arrangements are made.

Speira undertakes its intercompany transactions on an arm's length basis in compliance with the relevant tax law and OECD transfer pricing guidelines.

#### **4. Level of Tax Risk accepted**

Taxation outcomes are considered together with other factors as part of any commercial business decision. Once the business decision has been made, the most efficient tax treatment will be applied that is consistent with both the letter and spirit of the law.

Speira's aim is to minimise the level of risk in relation to UK taxation. Speira is not prepared to accept a level of risk that exposes Speira to reputational harm or which could adversely impact the relationship with HMRC.

#### **5. Relationship with HMRC**

Speira maintains an open, honest and timely dialogue with HMRC through communications in respect of developments in Speira's business and tax risks.

Speira ensures that HMRC is aware of any significant transactions or changes to the business and seeks to discuss tax issues arising at an early stage.

When submitting tax computations and returns to HMRC, Speira discloses all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain.