

NATIONAL TIMBER GROUP TAX STRATEGY

SCOPE

The National Timber Group group ('National Timber Group') comprises of National Timber Group Midco Limited and its subsidiaries. The principal activities of National Timber Group are the importing of timber and the manufacture and merchandising of timber and related products.

The published tax strategy applies to all UK subsidiaries of National Timber Group and covers all UK taxes. It has been approved by the Board and satisfies paragraph 19(2) of Sch 19 of FA2016 of the UK Finance Act 2016 in respect of the period ending 31 December 2024.

National Timber Group Midco Limited is committed to aiming for full compliance with all statutory obligations and full disclosure to relevant tax authorities.

The key principles of National Timber Group's approach to tax are:

- To comply with all laws and obligations relating to tax
- To maintain an open and transparent relationship with HMRC
- To do not engage in tax planning that aims to achieve a tax benefit contrary to the letter or spirit of the law
- To manage tax risk appropriately and have a low appetite for tax risk.

APPROACH TO TAX RISK MANAGEMENT AND GOVERNANCE

Ultimate responsibility for National Timber Group Midco Limited's tax strategy and compliance rests with the Board of National Timber Group Midco Limited.

Executive management of the group is delegated by the Board to the executive officers and the Chief Financial Officer ("CFO") is the executive officer with responsibility for tax matters and reports to the Board on tax affairs and risks during the year. It is the CFO's responsibility to ensure the Finance Team is staffed with appropriately qualified individuals, along with engaging external tax advisors and resources to the extent required. National Timber Group is also within the Senior Accounting Officer (SAO) regime; the CFO is the SAO and, aligned with the requirements of the regime, they take reasonable steps to maintain appropriate tax accounting arrangements.

The Board's requirement to monitor the integrity of National Timber Group Midco Limited's financial reporting system, internal controls, and risk management framework, includes those elements relating to taxation. The Board ensures that National Timber Group Midco Limited's tax strategy is one of the factors considered in all investments and significant business decisions taken.

National Timber Group Midco Limited operates a system of tax risk assessment and controls as a component of the overall internal control framework applicable to the group's financial reporting system. National Timber Group seeks to reduce the level of tax risk arising from its operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations. National Timber Group has zero tolerance for tax evasion or facilitation thereof.

Where appropriate, advice is sought from external advisers, including HMRC, on key and material tax decisions.

LEVEL OF ACCEPTABLE TAX RISK

National Timber Group Midco Limited manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax. The level of risk which National Timber Group accepts in relation to UK taxation is consistent with its overall objective to strive to achieve certainty in National Timber Group's tax affairs. At all times National Timber Group Midco Limited seeks to comply fully with its regulatory and other obligations and to act in a way which upholds its reputation as a responsible corporate citizen.

In relation to any specific issue or transaction, the Board is ultimately responsible for identifying the risks, including tax risks, which need to be addressed and for determining what actions should be taken to manage those risks, having regard to the materiality of the amounts and obligations in question.

ATTITUDE TOWARDS TAX PLANNING

National Timber Group's business decisions are always commercial in nature and are conducted with the aim of meeting National Timber Group's strategic objectives. National Timber Group's operations and corporate structure are not in any way designed to give rise to an artificial, contrived or unfair tax advantage. National Timber Group does not participate in transactions for the sole purpose of avoiding tax rules or creating an artificial, contrived or unfair tax advantage. National Timber Group may utilise tax reliefs and incentives in the manner that it believes they were intended to be used, in line with both the spirit and letter of the law.

APPROACH TOWARDS DEALINGS WITH HMRC

National Timber Group Midco Limited seeks a transparent and constructive relationship with HMRC as it does with all tax authorities. When submitting tax computations and returns to HMRC, National Timber Group Midco Limited aims to disclose all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain. Where applicable, National Timber Group co-operates fully with any requests from tax authorities.

National Timber Group Midco Limited, Board of Directors

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