



TAX POLICY

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Version Control

Version / date	Policy Manager	Policy Approver	Notes on changes since last version
V2.2 – November 2024	Group Head of Tax - Miranda Chamberlain	Chief Financial Officer – David Allen	No material amends. Expanded wording added at Section 1, 3, 4 & 5
v2.3 January 2025		Group Head of Tax - Miranda Chamberlain	No content change – annual review

1. Introduction

Mace is a purpose-led business committed to having a transformative, positive impact on our people, the communities in which we work and societies across the globe. One of our guiding priorities is to Pursue a Sustainable World and Mace recognises that Tax plays a material role in doing so.

Tax funds the activities of the governments of the countries in which we work. It redistributes wealth and influences behaviour, for example by encouraging action on climate change.

As a responsible business, Mace ensures that it pays its fair share of tax, in a timely manner, in all the countries in which we operate.

2. Scope

Mace is a UK-headquartered global business. This tax policy and approach applies to all of the Group's activities and entities, regardless of the country in which they are based.

This policy is effective from 13 November 2024 and will remain effective until any amendments are approved by the Board. This Policy has been prepared in accordance with paras 16 (2), schedule 10, Finance Act 2016.

3. A responsible business

Mace is proud to champion responsible business behaviours and is dedicated to adding long term social value through every service we offer.

Accordingly, Mace is committed to complying with tax law in a responsible way. Our policy is to pay the correct amount of tax, in a timely manner, with the level of transparency required by tax authorities and expected by our clients. The Group will implement this policy by:

- Paying the right amount of tax in accordance with relevant statute and case law.
- Not partaking in tax planning that is perceived to be aggressive or that delivers advantages that were clearly not the intention of the legislators. Any available tax exemptions / reliefs in the territories in which we operate will be applied where such

reliefs align with our operational presence in any jurisdiction and reflect the spirit of the relevant legislation.

- Taking decisions regarding both UK and international structuring that are driven by operational rationale, never with the aim of avoiding tax.
- Carrying out transactions between Mace Group companies on an arms-length basis in accordance with the relevant OECD guidelines. Never seeking to erode local profit margins for tax purposes through the artificial movement of costs.
- Taking reasonable care to prevent the facilitation of tax evasion by our staff and associates pursuant to our responsibilities under the Criminal Finances Act 2017.
- Conducting business in an honest, lawful and ethical way, without the use of corrupt practices or acts of bribery. Adopting a zero-tolerance approach to bribery and corruption of all kinds.
- Never using countries denoted as tax havens for tax avoidance purposes nor taking advantage of the opportunities for financial secrecy that these jurisdictions can provide. Any Mace presence in those countries will be for bona fide commercial reasons.
- Choosing to comply annually with the Fair Tax Mark awarded by the Fair Tax Foundation. The Fair Tax Mark is awarded to companies that can demonstrate they are paying the right amount of corporate tax at the right time and in the right place using clear and transparent structures. Additional tax reporting is required to meet this standard, and this is contained in the publicly available Tax Policy Report. Mace has been Fair Tax accredited since 2020.

4. Our relationship with HMRC and other tax authorities

We endeavour to promote a collaborative, professional working dialogue with HMRC and the tax / fiscal authorities in all overseas territories in which we operate.

We aim to build open, transparent and trusting relationships with the relevant authorities, acting promptly to establish certainty and to achieve early resolution of any tax-related disputes or queries.

Mace was awarded a Low Risk status from HMRC in 2022. Low Risk status is awarded where the taxpayer has an open and transparent relationship with HMRC and can be trusted to file returns accurately and on time and voluntarily to bring to HMRC's attention any matters which must be disclosed outside of the returns. It means the taxpayer can demonstrate that it maintains a robust tax risk management framework that is commensurate with the complexities of the business.

5. Tax risk management

Mace assesses and monitors areas and levels of tax risk and the on-going suitability of its existing tax risk management procedures regularly, often with the input of professional advisors. The Group documents and implements extensive control procedures over our tax compliance activities and undertakes internal audits of its tax compliance processes.

The Group Tax team plays an active role in the approval process for the creation of all new entities within the Group and any transaction with potential tax consequences. The helps Mace manage tax risk and reporting effectively.

As part of demonstrating its commitment to tax fairness, the Mace Executive Board reviews this policy annually and reviews evidence that it is being complied with.

6. Corporate governance

Strong, transparent and accountable governance safeguards Mace's health. It underpins our ability to 'Redefine the Boundaries of Ambition', providing development opportunities for all our people while building a robust and sustainable business.

As such, the Group Head of Tax, owns and takes responsibility for the Mace approach to tax and this is approved by the Group Board. The Group Head of Tax is responsible for:

- Embedding this Tax Policy consistently across the business and implementing processes to deliver the correct amount of tax;
- Monitoring, updating, measuring and amending this policy and the associated processes, as demanded by both tax legislation and best practice, to support the business as it grows; and
- Supporting the Group Board, and the business as a whole, in its commercial vision and maintaining the profile of tax on the Board agenda.

7. Further support

Any queries relating to this policy should be directed to the Group Head of Tax at info@macegroup.com.

8. Policy communication

This policy may be reviewed and updated at any time as required by Mace Group.