



TAX POLICY

September 2023
Version 2.1



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Version Control

Version / date	Policy Manager	Policy Approver	Notes on changes since last version
V2.1- September 2023	Group Head of Tax - Miranda Chamberlain	MEB Board representee, Mandy Willis	Minor amendment to Section 2: Scope, added reference to Finance Act and Policy review.

1. Introduction

Mace is a purpose-led business committed to having a transformative impact on our people, the communities in which we work and wider societies across the globe.

Our purpose shapes how we perform and the decisions we make; ensuring that the way we operate is sustainable, ethical and robustly governed within an environment, social and governance (ESG) framework.

2. Scope

Mace is a UK headquartered company with corporate presence across the globe. This policy applies to all Mace entities within the Group, regardless of the country they are based in, has been prepared in accordance with paras 16 (2), schedule 10, Finance Act 2016.

This policy is effective from 1 January 2023 and will remain effective until any amendments are approved by the Board.

3. A responsible business

Mace is proud to champion responsible business behaviors, with a dedication to adding longer term societal value through every service we offer.

In this vein 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 both tax authorities and our clients. To achieve these aims, our approach to tax is driven by the following undertakings:

- 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 legislation. 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 legislation.
- Taking decisions regarding both UK and international structuring, driven by operational rationale, and 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.

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- ~~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, taking a zero-tolerance approach to bribery and corruption of all kinds.
- Never using countries denoted as tax havens for tax avoidance purposes nor take advantage of the financial securities that these jurisdictions can provide. Any presence in those countries will be for reasons of bona fide commercial rationale.

4. Our relationship with HMRC

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

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

5. Tax risk management

We remain committed to effectively managing company risk and reporting.

Mace regularly assesses and monitors areas and levels of tax risk and the on-going suitability of its existing tax risk management procedures, often with the input of third party advisors. We document and implement extensive control procedures over our tax compliance function and we perform a wide audit programme internally on tax compliance processes.

The Mace Executive Board reviews this policy annually to ensure that it is complied with, and that the business is operating in line with our commitments to tax fairness.

6. Corporate governance

Strong, transparent and accountable governance safeguards

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

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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 those 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 high 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.