BRITISH STEEL

British Steel Group Tax Strategy

For the Financial Year ending 31 December 2026

This strategy specifically applies to British Steel Ltd (BSL) and any prospective future subsidiaries (together, the BSL Group). This BSL Group Tax Strategy is published in compliance with paragraph 19(2) of Schedule 19 to the Finance Act 2016.

References to ‘UK Taxation’ are to the taxes and duties set out in paragraph 15(1) of the Schedule which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, Stamp Duty Reserve Tax, Stamp Duty Land Tax and Customs and Excise Duties. References to ‘tax’, ‘taxes’ or ‘taxation’ are to UK taxation and to all corresponding worldwide taxes and similar duties in respect of which entities have legal responsibilities.

BSL Group is committed to complying with tax law and practice in all countries in which we operate, including the UK. We aim to pay the right amount of tax at the right time, on the profits we make in the territories where the underlying value has been created. We aim to comply with the spirit as well as the letter of the law.

<u>Approach to tax risk management and governance</u>

We employ a team of appropriately qualified and trained tax professionals (BSL Group Taxation) with the right level of expertise who work closely with the business to provide advice and guidance to ensure compliance with tax laws and practice. British Steel Group Taxation seeks to manage the BSL Group’s tax position proactively, including ensuring that available reliefs, exemptions and incentives are appropriately claimed in accordance with applicable legislation in all applicable territories.

The level of risk BSL Group accepts in relation to taxation is low. Tax considerations are assessed alongside commercial, legal, regulatory and reputational factors, and the Group seeks to manage tax risks in a proactive and responsible manner. The Board retains ultimate responsibility for the Group’s tax strategy and tax risk management framework and receives regular updates from BSL Group Taxation concerning significant tax risks, compliance matters and developments in tax legislation. Where appropriate, tax policies and guidance are issued to influence organisational behaviours to minimise risks based on the recommendations of BSL Group Taxation. Risk management processes are then implemented to ensure that the policies are properly followed including training relevant personnel as appropriate and periodical refreshment of policies in line with emerging tax laws and practice.

The Group maintains systems, processes and controls designed to ensure accurate tax reporting and compliance obligations are met in a timely manner.

Attitude to tax planning and level of acceptable tax risk

All tax planning is undertaken within the context of a wider business purpose or commercial rationale and will have regard to the potential impact on our reputation, broader goals and British Steel core values of unity, integrity, responsibility, understanding and excellence. The Group does not seek to achieve tax results that are inconsistent with economic substance of the underlying transactions and will only pursue tax positions where it believes there is a reasonable technical basis supported by legislation, case law, published guidance or established practice. At all times the BSL Group seeks to comply with the relevant domestic regulations and reporting requirements. Furthermore, the BSL Group will not undertake planning which is contrived or artificial and is not derived from a commercial requirement.

Given the scale of our business, global footprint and volume of tax obligations, risks may arise from time to time in relation to the interpretation of tax law and operation of our compliance arrangements. Diligent professional care and judgement will be employed to assess tax risks in order to arrive at well-reasoned conclusions on how the risks should be managed. Where there is uncertainty as to the application or interpretation of tax law, appropriate advice may be sought from third parties to support the decision-making process.

Approach to dealings with tax authorities

We seek to foster constructive, professional and transparent relationships with tax authorities, including HM Revenue & Customs ("HMRC"), based on the concepts of integrity, fairness, co-operation and mutual trust. We engage in full, open and early dialogue with tax authorities to discuss significant transactions, areas of uncertainty, tax risks and compliance matters. With the objective of minimising tax risk wherever possible we seek to resolve issues with HMRC on a real time basis and in the event that disagreements arise, we would strive to work with the tax authorities to resolve any disputed matters through proactive and transparent discussion and negotiation. We aim to obtain advance agreements or clearances where possible and litigation would only be considered as a last resort.

This Strategy is aligned with our core values and is approved, owned and overseen by the British Steel Ltd Board of Directors.

Approved by the British Steel Ltd Board of Directors on 2 September 2026