

Octopus Energy Group Tax Strategy

Year ending 30 April 2026

Introduction

This document sets out Octopus Energy Group's (the "Group") approach to tax risk and management (the "Tax Strategy"). The Tax Strategy was approved by the Oversight Committee on 11 December 2023.

On 12 September 2023, the Board of Directors (the "Board") of Octopus Energy Group Limited (the holding company of the Group) authorised the Oversight Committee to approve the Group's Tax Strategy. The Tax Strategy applies to all majority owned entities held directly or indirectly by Octopus Energy Group Limited. Where the Group holds minority interests the Group looks to ensure that those entities follow tax strategies that align with the Group's. The Strategy will be reviewed annually, and any material changes will be reviewed and approved by the Oversight Committee.

Risk appetite

The Group's appetite for tax risk is low. The business model and operating structure has evolved based on commercial and operating objectives and requirements. The Group has not artificially structured its business affairs to unreasonably minimise tax and the right amount of tax is materially accounted for and paid in accordance with the letter and spirit of the law in all group companies.

Tax risk management and governance

The Group manages tax risks within its group wide risk management and governance framework. The Board, with support from the Oversight Committee, is accountable for risk management and ensures that an effective risk management framework is in place, which includes tax risk.

Activities carried out by members of the Group are continuously monitored to ensure that the international tax policies of the Group are reflective of the activities of the Group.

The Group also uses reputable external advisors to provide tax compliance and advisory services. Most of the Group's tax compliance is outsourced to external advisors. Any internal tax compliance is carried out by suitably qualified and trained finance personnel, who consult with external advisors as necessary. External advisors are also engaged on all material transactions undertaken to ensure that tax impacts are understood and correctly accounted for.

Our attitude to tax planning

The Group will only utilise legitimate tax reliefs for the purposes for which they were intended. The Group does not:

- engage in aggressive tax planning;
- structure transactions in an artificial manner inconsistent with the underlying economic substance; or
- promote tax avoidance or condone abusive tax practices which would go against the Group's ethics and culture or the law.

Dealings with tax authorities

In line with the Group's attitude to tax planning and appetite for tax risk, the Group will always work with tax authorities in a co-operative and transparent manner.

This tax strategy is compliant with the requirements of Schedule 19 of Finance Act 2016.