

Octopus Energy Group Tax Strategy

Year ending 30 April 2021

Tax risk management and governance

The Octopus Energy Group manages tax risks within our group wide risk management and governance framework. Our Board, is accountable for risk management and ensures that an effective risk management framework is in place, which includes tax risk.

We also use reputable external advisors to provide tax compliance and advisory services. Most of our 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 we undertake to ensure that tax impacts are understood and correctly accounted for.

Risk appetite

Our appetite for tax risk is low. Our business model and operating structure is straightforward and not subject to significant judgement in the application of tax law. We do not artificially structure our business affairs to unreasonably minimize tax and we pay the right amount of tax in accordance with the letter and spirit of the law in all our operating companies.

Our attitude to tax planning

We will only utilize legitimate tax reliefs for the purposes for which they were intended. We do 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 our ethics and culture or the law.

Dealings with tax authorities

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

This tax strategy was approved by the Board of Octopus Energy Group Limited on 23 April 2021.