

# EDF ENERGY TAX STRATEGY STATEMENT

## FINANCIAL YEAR ENDED 31 DECEMBER 2024

### Introduction

The Finance Act 2016 requires large UK groups or sub-groups, companies or partnerships to publish a UK Tax Strategy. We regard this Tax Strategy statement to meet our obligations under paragraph 19(2), Schedule 19, Finance Act 2016.

This Tax Strategy is published annually but is reviewed periodically by the tax team to ensure it keeps ahead of best practice and governance protocols; any amendments will be approved by The Board.

### About us and our future commitments

EDF Energy Holdings Limited (“EDF Energy”) and its subsidiaries aim to fulfil their vision in “**Helping Britain achieve Net Zero - Together**” by:

- The supply of zero-carbon electricity and gas to commercial, residential and industrial customers, including building a network of smart Electric Vehicle charging points, solar panel and heat pump installations;
- Maintaining a portfolio of generation assets including nuclear and renewable generation;
- Building new smart, flexible battery storage technology across Britain; and
- The development and construction of the UK’s new nuclear power stations.
- In 2024, we sold our last Gas Storage facilities and now have net zero generating assets. By achieving zero carbon electricity from wind, nuclear and solar, it demonstrates our commitment to being a responsible business.

This commitment adds to the complexity of our business as we develop, build, operate, and maintain renewable technologies, battery storage and nuclear power stations. As the increased complexity inevitably leads to increases in tax compliance obligations and tax risks, we:

- Aim to manage and mitigate those increased obligations and risks, and
- Always act with integrity and strive to be trusted by all our stakeholders, including the tax authorities, in how we conduct our tax affairs.

### Our Tax Strategy

As we pursue our commercial goals, we are faced with tax obligations and choices in how we meet them. To inform our behaviours in how we make these choices, we follow our Tax Strategy. This Tax Strategy is aligned with the EDF Group Ethics Charter and the EDF Energy Code of Conduct, applies throughout EDF Energy, and has been approved by The EDF Energy Holdings Limited Board (“The Board”). It is consistent with our ultimate parent company’s (EDF SA) overall strategy, which aims to create value for the business and shareholders while upholding its reputation and commitment to responsible business practices.

### Our commitment to tax compliance

EDF Energy is committed to meeting its obligations that arise from local, national and international regulations.

We aim to act with integrity in all tax matters, with a commitment to full compliance with all tax legislation and full disclosure to tax authorities in the jurisdictions in which we operate. Where appropriate, we seek advice from industry experts and external advisors to ensure we are fully compliant.

Part of this compliance process is knowing how the business transactions and activity create tax risk. This knowledge has been obtained over many years via a comprehensive understanding of the tax attributes of the business. We continually develop, maintain and improve processes and controls to ensure all tax risks are highlighted, managed and controlled. Where we identify material tax uncertainties, full disclosure is provided to the tax authorities.

## Our approach to the identification and managing of risk

EDF Energy is proactive in managing all financial risks, including tax risks, and utilises a robust governance framework throughout its business to ensure there is the appropriate level of oversight and engagement by The Board. The Chief Financial Officer holds accountability for tax matters at Board level and delegates the management of day-to-day responsibilities to the tax team, led by the Tax Director. With a low tolerance for tax risk, we ensure tax risks are highlighted and monitored and the most significant are managed and minimised. We use technology to maximise quality and accuracy, to support our tax filings, and continuously strive to improve processes.

A principle of subsidiarity is applied; each Business Unit and Central Support Function is responsible for maintaining an effective system of risk management and internal control, operating appropriate governance over this system and reporting on risk and internal control system effectiveness.

Responsibilities for operating and monitoring risk management and internal control activities are clearly documented and communicated across the company. We ensure that our employees undertake necessary education and training to ensure an appropriate awareness of roles, responsibilities and accountabilities.

Our tax team are involved in all significant business developments and are suitably experienced and regularly trained to provide up to date technical advice so that risks are minimised and EDF Energy can adhere to its Tax Strategy.

At least annually, the Audit Committee reviews the company's top risks, the effectiveness of the internal control framework and a summary of management's self-assessment of internal controls, which includes a review of the process for identifying and managing risks. The Audit Committee also reviews reports from Internal Audit on the adequacy of controls for key risks at each of its meetings. Summary reports are provided to the Board after each Audit Committee.

## Our approach to tax planning

We aim to manage our tax affairs in an efficient and proactive manner to ensure our tax attributes maximise value for our shareholders whilst maintaining our reputation as a responsible corporate citizen.

EDF Energy pays UK tax in accordance with all laws and regulations. We do not participate in any artificial schemes or arrangements that are primarily designed and focused on reducing tax liabilities.

We only undertake tax planning to enable the elimination of tax risk created by our day to day business operations. In this context, tax risk is the creation of tax liabilities that are not intended by legislation.

We utilise tax incentives, exemptions and reliefs where they are relevant to our business and apply them in the manner intended by the Government. We ensure transactions between EDF Energy and its subsidiaries are conducted on an arm's length basis.

## Our approach to dealings with HMRC

We work together with the tax authorities in a style that is open and honest in order to build positive, long term relationships. We aim to liaise with tax authorities in real-time, maintaining regular contact and dialogue to ensure complete transparency of our tax liabilities and obligations.

Where tax legislation is unclear, or may be considered unclear, we disclose our position and uncertainty to HMRC. This approach is applied proactively, to both current and future events and transactions.

We continually review our business processes to ensure they comply with tax legislation. Where these reviews discover errors, we share these with HMRC to agree actions and their impact on past, present and future tax liabilities. This Tax Strategy is published annually but periodically reviewed by the tax team to ensure it keeps ahead of best practice and governance protocols; any amendments will be approved by The Board.