

EDF ENERGY TAX STRATEGY STATEMENT

FINANCIAL YEAR ENDED 31 DECEMBER 2025

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 meets 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 seek to build, power and serve “an Electric Britain”, believing it is the country’s best chance of an affordable and secure low carbon future. With its significant presence across the electricity value chain, EDF Energy is well placed to play a key role in the creation of an Electric Britain:

- Operating a portfolio of zero carbon* nuclear generation assets.
- Constructing and supporting development of new nuclear generation assets through Hinkley Point C and Sizewell C.
- A critical role in the UKs nuclear supply chain through Arabelle’s factory in Rugby
- Supplying electricity and gas to residential, public sector, commercial and industrial customers.
- Selling products and services to support customers to electrify and decarbonise their homes and businesses delivered through full ownership of EV charge point installation company Pod, EDF Heat Pumps and Contact Solar.
- Providing homes, businesses and flexible asset owners with optimisation services to support an energy system increasingly dominated by intermittent generation.

Our focus on zero carbon* electricity generation and supporting customers to decarbonise their homes and businesses, demonstrates our commitment to being a responsible business. This commitment adds to the complexity of our business as we operate across many parts of the energy value chain. 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.

*zero carbon at point of generation

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.

All tax decisions taken by EDF Energy consider relevant laws, regulations and the commercial factors of any transaction.

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, review 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, the Tax team monitor tax legislation and regularly trained to provide up to date technical advice so that risks are minimised and EDF Energy can adhere to its Tax Strategy. Training and guidance is provided to non-tax specialist colleagues on tax matters relevant to their roles.

We do not tolerate tax evasion or facilitation of tax evasion by persons acting on behalf of EDF Energy.

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.

EDF Energy follows OECD Transfer Pricing Guidelines, which are based on the arm's length principle.

Our approach to dealings with HMRC

We work together with the tax authorities in a style that is open and honest 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. This is in line with EDF Energy's overall prudent approach to its tax responsibilities.

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.