Vaillant UK's Approach to Managing Tax



TAKING CARE OF A BETTER CLIMATE

This statement is prepared in accordance with the requirements of schedule 19 of the Finance Act 2016, paragraph 16(2). The Vaillant Group is German owned, but this statement relates to the UK Group of companies as indicated in the footer. The UK Group is a large group made up of 10 companies; therefore, we recognise that we have a responsibility to ensure that the taxes we pay and the relationships with the tax authorities are appropriately managed.

The Tax Governance & Control Framework within the UK

The UK Board is ultimately responsible for identifying, reviewing, and managing tax risk. It is their responsibility to consider how effectively those risks have been managed, whether necessary actions have been taken promptly enough to remedy any weaknesses and whether the causes of the weakness indicated poor decision taking, a need for more monitoring or a reassessment of the effectiveness of management's on-going processes.

The UK follows the Group approach to tax Governance and risk management. Internal transparency and accountability ensure that the tax governance and control framework remain robust.

Key support is provided by our UK Tax Department with many years' cumulative experience providing tax support within the business. Where appropriate, external advisors may be used to prepare returns and advise on tax matters.

Employees are suitably trained and any changes in Laws and Regulations are communicated and implemented promptly. All key returns should be reviewed by suitably trained and experienced staff prior to submission.

Our tax policy sets out our tax guiding principles. This document outlines the governance and control framework that should underpin our policy and reflect our core values. Tax policy should always be prepared by the Senior Tax Manager in the Tax Department, based on an understanding of the Board's low appetite for risk, and in response to any risk assessments undertaken.

Policies are essential in providing our business with a framework within which the control environment can operate.

Adherence to policies is monitored by way of control setting, internal review, self-assessments and feedback both to the Board and to Group.

Tax risk and controls are subject to continuous review by the Tax Department. Further controls and documentation will then be developed as and when deemed necessary.

UK approach to Tax Planning

The UK does not engage in artificial tax planning schemes and indeed our tax policy clearly states that it is our desire and intention to pay the right amount of tax (in keeping with the spirit and letter of the Law) and not simply to minimise the tax bill.

Consequently, the UK Group does not have subsidiaries in "tax haven" locations.

Where, however, reliefs or incentives are available, the UK Group will use certain parameters to determine whether the tax risks presented are acceptable or not:

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Considerations	Parameters
Commercial purpose	All transactions must have a commercial purpose.
Reputation impact	The opportunity should have no or limited perceived impact if details were in the public
	domain.
Strength of tax advisors'	Appropriate external advice, including tax counsel opinions (where relevant), must be
opinion	obtained as necessary. A favourable opinion should be obtained from appropriately
•	qualified tax advisors before proceeding.
Risk/materiality	Our Group is ultimately a family-owned private business; therefore, the ultimate shareholders continue to follow a conservative approach in relation to tax risks.

Level of Acceptable Risk

As the Vaillant Group is a family-owned business, its appetite for tax risk is determined by the desire to achieve certainty in its tax affairs and minimise reputational risk.

Risk is managed by a framework of policies, processes, and internal controls to ensure tax reporting and submissions are materially accurate and submitted on time.

The company certifies annually that it has appropriate tax accounting arrangements under the Senior Accounting Officer regulations Schedule 46, Paragraph 2 Finance Act 2009.

Working with HMRC

In line with our Tax Policy, our Group is committed to open and co-operative compliance with the tax authorities.

We will engage in open and early dialogue to discuss any potential tax planning, strategy, risks and any significant transactions where clarity on tax treatment may be required.

Where errors have been identified as a result of our internal reviews, we will actively seek to make any necessary corrections without delay, with full disclosure.

FURTHER INFORMATION

Document Approval	Board of Vaillant Group UK Ltd
Document Owner	Finance Director UK & Ireland
Document Preparer	Senior Tax Manager
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