

**This page document sets out the strategic tax objectives for the Rullion group of companies for financial year 2026.**

The statements below apply to Rullion Ltd and all subsidiaries hereafter referred to as the Group. Our tax strategy is reviewed annually by the Finance Director, who is also the Senior Accounting Officer and is ultimately responsible for management of the tax affairs of the group.

This strategy applies from the date of publication until it is superseded. References to 'UK taxation' are to all taxes and duties in the UK. These include:

- Employment taxes (PAYE / National Insurance / Construction Industry Scheme)
- All corporate income taxes
- Indirect taxes (VAT, Stamp Duty Land Tax)
- Any other applicable tax matters

Rullion's business activities means we generate and collect a substantial amount of taxes. The taxes the group pays and collects form a significant part of its economic contribution to the UK.

**RULLION'S ATTITUDE TO TAX PLANNING**

Rullion is committed to complying with tax laws in a responsible manner and to having open and constructive relationships with tax authorities.

Our tax strategy is approved by the managing board of Rullion and sets out the group's general tax arrangements as well as the policy and approach to tax risk management, attitude to tax planning and working with HM Revenues and Customs (HMRC).

Rullion undertake ethical and transparent business practices and encourage an open and honest dialogue between tax policy makers and business.

We report and disclose our tax positions in accordance with applicable regulations and requirements in force at the time of reporting.

We are committed to complying with our tax obligations and maintaining good relationships with HMRC. We keep HMRC informed of business activities, results and key developments and pro-actively disclose and resolve issues and risks, which involves regular meetings with HMRC's dedicated Customer Compliance Manager and their assigned tax specialists.

Our tax strategy is focused on ensuring that taxes (and tax risks) are managed to provide outcomes consistent with commercial reality and are within the parameters of the Group's strategic objectives.

## **TAX RISK MANAGEMENT AND RISK APPETITE**

The day to day management of Rullion's tax affairs is provided by the finance team under the supervision of the CFO. The team carry out an annual review of activities and processes to identify key risks and the mitigating controls in place. These key risks are monitored for changes in business and legislation and processes and controls are updated accordingly. We are supported in this goal by our auditors as part of their audit process.

Rullion utilises tax reliefs and allowances available in the manner intended by HM Revenue & Customs and statute. Rullion does not engage in artificial tax arrangements and ensures that the outcomes are consistent with commercial realities.

Rullion controls and manages tax risks and the Group's reputation through appropriate policies, communication and robust operational procedures. Rullion regularly engages with external tax professionals to ensure compliance with best practice.

Rullion's appetite for tax risk is low and we only structure our affairs based on sound commercial principles and in accordance with relevant tax legislation. Aggressive tax planning is not countenanced and external advice is sought where deemed appropriate.

We aim for certainty on the tax positions we adopt. We will not enter into transactions that have a main purpose of gaining a tax advantage and we will not make interpretations of tax law that are opposed to its original spirit.

When reviewing the tax risks associated with a specific decision or action, the Group ensures that the following are considered:

- The legal and fiduciary duties of directors and employees.

- The requirements of any related internal policies or procedures.

- The maintenance of the Group's corporate reputation, having regard to the way we interact with other stakeholders.

The tax legislation concerning employment agencies and associated activities is complex and regularly evolving and Rullion actively seek to operate within the prevailing legislation.

## **NEW TAX RISKS IN 2026 AND MITIGATION**

From 6 April 2026, the new umbrella supply-chain rules shift PAYE and Class 1 NIC accountability onto the agency contracting with the end client (or the end client where no agency sits in the chain), increasing our exposure to tax underpayments, penalties, interest, and reputational damage if any umbrella we use is non-compliant. In response, we will materially shrink our umbrella PSL to a small number of large, highly reputable umbrellas only, and we will run intensive upfront and ongoing due diligence. This will include using FCSA accreditation (often mis-typed as "FSCA") and the SafeRec compliance tool as

mandatory gates for approval and continued use, alongside contractual controls such as audit rights, data-access obligations, rapid termination triggers, and robust tax indemnities.

### **RULLION'S RELATIONSHIP WITH HMRC**

It is Rullion's policy to be transparent and proactive in all interactions with HMRC through regular meetings and communications with HMRC.

Rullion strive to have an open, honest and positive working relationship with HMRC. We are committed to prompt disclosure and transparency in all tax matters. In addition, we seek to be open and transparent about decision-making, governance and tax planning. We aim to interpret the relevant laws in a reasonable way and ensure transactions are structured in accordance with a co-operative relationship.

Rullion understands the role that taxation plays in society. We understand that tax helps to fund vital public services and infrastructure, and when paid fairly it ensures a level playing field for all businesses, regardless of size. We also aim to participate in any consultation processes HMRC operate in regard to taxation proposals that may affect the Group.