NPL
National Physical Laboratory

NPL Management Limited – Tax Strategy 2026

1. Introduction

This Tax Strategy sets out the approach of NPL Management Limited ("the Company") to the management of tax affairs in the United Kingdom and applies for the financial year ending 31 December 2026.

The Strategy is approved by the Board of Directors and is reviewed at least annually. It reflects our commitment to conducting our tax affairs in a responsible, transparent and sustainable manner, consistent with our broader business and governance objectives.

This document is published in accordance with Part 2 of Schedule 19 to the Finance Act 2016, where applicable.

2. Our Approach to Tax

The Company recognises taxes as a significant cost to the business and an important contribution to public finances. Our overall approach to tax is guided by the following principles:

- Compliance with all relevant UK tax laws and regulations
- Alignment of the tax position with the commercial substance of transactions
- Consideration of tax implications as part of responsible business decision-making
- Maintenance of high standards of governance, integrity and transparency

The Company does not engage in artificial or contrived tax arrangements where the primary purpose is tax avoidance.

3. Governance

The Board has ultimate responsibility for the Company's tax strategy and risk appetite. Day-to-day responsibility for tax matters is delegated to the Chief Financial Officer, who is supported by the Tax Compliance Manager and the in-house finance team. Additional specialist support is sought from external professional advisers, as appropriate.

Key elements of governance include:

- Clearly defined roles and responsibilities for tax matters
- Board oversight of material tax risks and significant transactions
- Escalation procedures for uncertain or high-risk tax positions

4. Risk Management

Tax risks are identified, assessed and managed as part of the Company's wider risk management framework. A tax specific risk register is maintained by the Tax Compliance Manager. Key risk areas include:

- Changes in tax law or HMRC interpretation
- Complex or non-routine transactions
- Employment tax, VAT and Customs Duty compliance

Controls are in place to mitigate these risks, including internal review procedures, a documented tax framework, a tax compliance calendar and professional advice where required.

9. Transparency and Reporting

The Company is committed to transparency in its tax reporting and disclosures.

- Taxes are reported accurately in the statutory accounts in accordance with applicable accounting standards.
- The Company complies with obligations under Senior Accounting Officer (SAO) and other applicable UK tax regimes.
- This Tax Strategy is made publicly available in line with legislative requirements.

10. Review and Approval

This Tax Strategy was approved by the Board of Directors of NPL Management Limited on [date] and will be reviewed annually or more frequently if there are significant changes to the business or tax environment.

Board Approval

Signed on behalf of the Board of Directors:

Name: Penny Holt
Title: Chief Financial Officer
Date: 30th June 2026