

Tax Strategy

This UK tax strategy is owned and approved by the Board of Directors and covers all UK taxes relevant to Marcegaglia Stainless Sheffield Ltd (“the Company”). The Company regards this publication as complying with Paragraph 19(2) of Schedule 19 of the Finance Act 2016 and is effective for the financial year ended 31 December 2024.

This document sets out the Company’s policy and approach to conducting its tax operations and managing its tax risk.

The Company’s immediate parent company is Marcegaglia Steel SpA and the ultimate controlling parties are A and E Marcegaglia who are shareholders of Marcegaglia Holding S.r.l., the ultimate parent undertaking.

This Tax Strategy and our tax culture align with the Marcegaglia Group core values of honesty, integrity and accountability and support the success of our business operations.

1.1 Tax Objectives

This Statement is made on behalf of the Company pursuant to Section 19 of the Act and sets out to fulfil the Company’s duty to publish a UK tax strategy. Consistent with the objective for the Company’s finance team, when managing the Company’s tax position, is to support the Marcegaglia Group’s overall tax strategy whilst ensuring compliance with local tax laws and filing obligations. Tax performance is measured in the following ways:

- paying the amount of tax legally due according to HMRC due dates;
- submission of all UK tax returns on a timely basis including appropriate detail to allow HMRC to understand the filing;
- ensuring the UK’s tax processes are adequately resourced, supported and key personnel are trained and retained to manage tax compliance issues on a timely basis;
- ensuring all tax filing positions are reviewed and supported with appropriate documentary evidence;
- ensuring the relevant claims, elections and incentives are made to minimise the tax cash paid by the Company; and
- implementing and maintaining controls and procedures relating to all taxes to enable the correct tax to be paid.
- where a tax liability arises in another territory that the correct amount of tax is paid in a timely manner.

1.2 Tax Risk Management and Governance approach

Marcegaglia promotes a culture of sound risk management. Effective tax risk management is paramount for the Company and underpins the strategy for continued growth. The Company strives to reduce the level of tax risk arising from its operations as far as is reasonably practicable by applying reasonable care in relation to undertakings which could materially affect compliance with tax obligations.

Marcegaglia Stainless Sheffield Ltd.

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Number 13909552

The tax strategy is aligned with Marcegaglia's Code of Ethics which can be found on the Marcegaglia website (www.marcegaglia.com) and is owned and approved by the Board of Directors of Marcegaglia.

The Company applies OECD guidelines to our intercompany transactions and seeks to operate at arms-length and with transparency in dealings across the Marcegaglia Group.

1.3 Acceptable Level of UK Tax Risk

The CFO, Head of Finance & Financial Controller with support, as needed, from the Board, other Marcegaglia Group tax and financial personnel and third-party advisors will endeavour to understand tax risks and opportunities regarding ongoing compliance efforts, tax planning opportunities and future transactions. These individuals must be integrally involved in the planning, implementation and documentation of all tax compliance matters and significant business transactions and tax processes.

Appropriate training, resourcing and support are provided to those individuals involved in the management and execution of tax activities.

As uncertainty arises in the application of tax law within the UK operation, the opinion of third-party advisors will be obtained to understand the application of law to the facts and provide the risks and alternatives, with appropriate documentation and conclusions which support decision-making.

Final approval is required to be given by the CFO and in the case of material transactions, approval by the Board of Directors will be confirmed.

1.4 Attitude to Tax Planning

Marcegaglia Stainless Sheffield's tax risk tolerance is low as it is our goal pay the appropriate amount of taxes in the arenas in which we operate in a timely manner.

Marcegaglia Stainless Sheffield fundamentally believes that it should pay the amounts of tax legally due in the UK and will not engage in transactions where the main purpose is the avoidance of UK taxation. The Company has a zero-tolerance approach to tax evasion and the facilitation of tax evasion by its employees and associated third parties.

Where uncertainty is encountered around the interpretation of tax law and alternative business and commercial options for transactions are available, the most tax-efficient option will be preferred.

The assessment of generally available tax planning relief opportunities is driven by commercial purposes, reputational and financial impact to the Company, and advice of tax specialists to ensure compliance with UK tax law when appropriate. Consideration is also given to maintaining a transparent and open working relationship with the HMRC.

Tax planning requires authorisation by the CFO and any material planning requires advice from Third-Party tax professionals, approval by the Board of Directors following prior approval from Marcegaglia Group.

1.5 Working with HMRC

Marcegaglia Stainless Sheffield Ltd works closely with HMRC and its dedicated Customer Compliance Manager in relation to current, future and past tax issues to ensure fulfilment.

In respect of any significant and/or extra-ordinary business transactions which are not in the nature of normal trading, clearance from HM Revenue and Customs is sought.

When “know your customer visits”, tax enquiries or audits take place, the Company adopts a proactive approach to the provision of information to HMRC in order to aid the prompt resolution of any matters under review. In order to be able to supply such information, we endeavour to comply with all local document retention requirements.

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