

Group Tax Policy

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| Approver: | Policy Owner |
| Rationale: | Tax Risk is recognised as a material risk in Macquarie's risk management framework. A failure to comply with applicable tax laws, regulations or rulings or a failure to meet other Revenue Authority requirements or expectations can result in significant adverse financial or non-financial impacts. |
| Policy statement: | This policy outlines the principles that govern Macquarie's approach to Tax Risk including the framework by which Macquarie's operational and risk management obligations are met and adheres to the risk appetite principles outlined in Macquarie's Risk Appetite Statement. |
| Application: | This Policy is applicable to all Macquarie staff employed or engaged by Macquarie Group Limited, Macquarie Bank Limited, or any of their subsidiaries who engage in or support the activities covered by the Scope of this policy. |

1. General

1.1 Context

Tax Risk can be material and have significant adverse financial or non-financial impacts on Macquarie. Tax Risk has the potential to extend beyond relationships with Revenue Authorities, negatively impacting Macquarie and its business performance, as well as our broader relationships with clients, counterparties, and the communities and markets in which we operate.

This policy outlines the principles that govern Macquarie's approach to Tax Risk, aligned to Macquarie's commitment to sound Environmental, Social and Governance (ESG) practices as part of our responsibility to our clients, shareholders, employees and the communities in which Macquarie operates.¹ Macquarie's ESG approach is structured around eight focus areas, one of which is business conduct and ethics, and includes Taxation. As part of that commitment, Macquarie acknowledge stakeholder expectations for increased transparency on tax-related matters as a signatory to the Australian Board of Taxation's voluntary Tax Transparency Code.

This document complies with Macquarie's duties under paragraph 19(2) and paragraph 22(2) of Schedule 19 of the Finance Act 2016 to publish a UK tax strategy for the financial year ended 31 March 2025. References to a "Revenue Authority" and "tax" in this document shall, in the case of the UK subsidiary undertakings of Macquarie Group Limited, mean HM Revenue and Customs and tax chargeable under the laws of the United Kingdom respectively.

1.2 Scope of this policy

This policy covers all circumstances, activities or situations relating to Tax Risks.

Tax Risk includes any event, action, conduct or inaction in tax strategy, operations, financial reporting or compliance that has the potential to either adversely affect Macquarie's tax or business objectives or result in an unanticipated or unacceptable level of monetary, financial statement or reputational loss or exposure.

Tax Risk can take a number of different forms, for example: tax withholding or payment failure, misinterpretation or misapplication of tax law or a tax filing or reporting failure, and is an inherent part of Macquarie's ordinary business operations.

References in this Policy to the Tax Function relate to the global Tax teams.

¹ Macquarie Annual Report 2024, page 5151

2. Policy requirements

2.1 Key principles

The key principles that govern Macquarie's approach to Tax Risk include:

- identification, assessment, control and reporting of Tax Risk
- compliance with laws, regulations, administrative requirements and required disclosures to Revenue Authorities
- documented and regularly maintained policies and procedures in relation to Tax Risk management
- integrity of our tax data, compliance and reporting systems
- open, transparent and professional relationships with Revenue Authorities, both local and international
- resolution of outstanding issues with Revenue Authorities as effectively as possible
- undertaking international related party transactions based on commercial considerations and in accordance with arm's length principles.

While Macquarie may be entitled to tax concessions in the course of its normal business, there is no appetite for any transaction that is motivated by the avoidance of tax.

Moreover, Macquarie will not finance or in any other way support transactions where the objective of any of the parties might reasonably be expected to be the obtaining of a dividend withholding tax benefit.

2.2 Transactions

Tax issues must be properly recognised at the earliest stages of a transaction.

When seeking input and sign-off from the Head of Tax (or delegate) in relation to a transaction, investment or product, the Operating and Central Service Group (Groups) must provide all necessary information, including:

- a detailed description of the commercial objectives and rationale for the transactions
- facts and assumptions
- size of the transaction
- involvement of third parties or other jurisdictions
- the potential exposure from legal action by third parties
- external advice received
- timeframe of the transaction
- any required approvals.

Groups are responsible for appropriately implementing transactions and promptly informing the Tax Function of any changes to the facts.

Groups may seek advice from external advisors in the event of tax uncertainty, however this must be approved by the Tax Function.

Environmental and social risks in transactions, including equity investments, financing, leasing and advisory mandates must be assessed in accordance with Macquarie's [Environmental and Social Risks Policy](#).

2.3 Accuracy of tax returns and other reporting

Macquarie employs robust compliance procedures to enable accurate and complete tax returns and other reporting. Regular reviews of the Tax Function are conducted to determine the appropriateness of resourcing, the robustness of processes and that compliance procedures are accurate and supported by appropriate controls, systems and technology.

2.4 Tax reporting to the Board Audit Committee

Tax issues and risks are regularly considered with the Chief Finance Officer (CFO) and escalated to the MBL and MGL Executive Committees and Board Audit Committees (BAC) as appropriate.

The CFO, with the assistance of the Head of Tax, reports to the MGL and MBL BACs at least annually in relation to tax matters and tax governance.

The Chief Risk Officer is also consulted on relevant tax issues.

2.5 Tax Risk Management

The Tax Function oversees and monitors the Tax Risks of all entities within the Macquarie Group. Macquarie has a robust Tax Risk management framework and a highly experienced global tax team. The Head of Tax and Co-Heads of Finance & Tax\Group Financial Controller are responsible for ensuring that appropriate controls are in place to manage identified risks. The Tax Function also undertakes a continuous programme of control assurance testing, and the design and effectiveness of the Macquarie Tax Control Framework is regularly reviewed by Macquarie Internal Audit.

2.6 Revenue Authorities

The Tax Function manages relationships with various Revenue Authorities globally. These professional relationships are established and maintained to enable an efficient and collaborative approach to managing tax issues.

In the event of tax uncertainty, Macquarie may engage with and seek advice from Revenue Authorities.

2.7 Industry groups

The Tax Function participates in relevant industry forums and consultation processes as appropriate to maintain Macquarie's engagement with current tax issues and developments.