The Norton Motorcycle Co. Limited – UK Tax Strategy

1. Introduction and Legislative Compliance

This document sets out the UK Tax Strategy for The Norton Motorcycle Co. Limited (Company Number - 12545195) ('the Company') having its registered address at Unit 500 Solar Park, Highlands Road, Solihull, B90 4SH.

This Tax Strategy is published in accordance with the requirements of Schedule 19, paragraph 19(2) of the Finance Act 2016 and applies to all UK taxes applicable to the Company, including corporation tax, VAT, PAYE, National Insurance contributions, customs duties and other indirect taxes.

The strategy is approved by the appropriate governing body within the Company, applies for the current financial year, and will be reviewed annually and updated as required.

2. Governance and Management of UK Tax Risk

TVS Motor Company Limited, intermediate parent company, is a global automotive and mobility group committed to responsible business conduct, strong corporate governance and compliance with applicable laws in all jurisdictions in which it operates.

Ultimate responsibility for the management of UK tax affairs rests with the Board and senior management of the Company, with operational responsibility delegated to senior finance leadership supported by internal finance team.

The Company manages its UK tax risk through a robust governance and control framework, which includes:

- Clearly defined roles and responsibilities for tax compliance and reporting
- Strong internal financial controls and systems to support accurate tax reporting
- Ongoing monitoring of tax risks arising from business activity, legislative change and operational developments
- Engagement of external professional advisers to support areas of technical complexity and uncertainty

Tax risks are identified, assessed and managed on a proactive basis. Significant or uncertain tax matters are escalated appropriately and reviewed to ensure consistency with UK law and advice is sought from local tax advisors where necessary. These significant or uncertain tax matters are also presented to the board for their consideration as part of the governance meetings.

3. Attitude to Tax Planning

The Company is committed to paying the right amount of tax, in the right place, at the right time, in line with both the letter and the spirit of UK tax legislation.

Tax planning is undertaken only where it:

- Is supported by genuine commercial substance and operational activity
- Aligns with the commercial objectives of the Company
- Complies fully with UK tax law and relevant international standards, including OECD principles
- Does not create reputational risk or conflict with the Company's corporate and social responsibilities

The Company may claim reliefs, incentives and exemptions that are clearly intended by UK legislation, such as capital allowances or research and development incentives, where these are available and appropriate.

Tax considerations are not the primary driver of business decisions and tax is not treated as a key performance indicator.

4. Level of Risk Accepted in Relation to UK Taxation

The Company has a low appetite for tax risk and seeks certainty in its UK tax positions wherever reasonably possible.

This approach is supported by:

- Timely submission of accurate UK tax returns with appropriate disclosures
- Payment of taxes in accordance with statutory deadlines
- Maintenance of robust tax accounting processes and controls
- Seeking external professional advice where required
- Quantifying and monitoring tax risks where uncertainty exists

Where differing interpretations of tax law arise, the Company adopts positions that are considered more likely than not to be sustained if challenged by HMRC. The Company does not engage in aggressive tax planning or adopt high-risk tax positions.

5. Relationship with HM Revenue & Customs (HMRC)

The Company seeks to maintain an open, honest and constructive relationship with HM Revenue & Customs, based on transparency, cooperation and mutual trust.

In its dealings with HMRC, the Company aims to:

- Act with integrity and professionalism at all times
- Submit UK tax returns by their statutory filing deadline
- Respond promptly and fully to HMRC enquiries
- Provide clear, accurate and complete information where reasonably required
- Engage proactively with HMRC regarding significant transactions or changes in business activity
- Seek advance clearances or engage in real-time discussions with HMRC where appropriate

The Company's objective is to resolve tax matters efficiently, minimise disputes and maintain a positive and cooperative working relationship with HMRC.

6. Communication and Review of the Tax Strategy

This UK Tax Strategy is communicated to relevant stakeholders within the Company, including senior management and finance teams involved in commercial decision-making and tax compliance processes.

The principles set out in this document are subject to periodic review to ensure continued alignment with business activities, regulatory requirements and stakeholder expectations.

Date: June 19, 2026