CooperSurgical Holdings Limited Tax Strategy

Introduction

This document sets out the tax strategy of CooperSurgical Holdings Limited and its UK subsidiary undertakings (the "UK Group"). In making this strategy available the UK Group is fulfilling its responsibilities under paragraph 16 (2) of Schedule 19 of the Finance Act 2016.

This tax strategy applies to all UK taxes applicable to the UK Group and the document is owned by the Board of Directors of CooperSurgical Holdings Limited ("the Board"). The document will be periodically reviewed and any amendments will be approved by the Board. It is effective for the year ending 31 October 2026 and will remain in effect until any amendments are approved by the Board.

The finance teams of the UK Group are accountable to the Board for the implementation of the tax strategy and the management of tax and related risk.

UK Group Tax Policy

The UK Group is committed to:

- Following all applicable laws and regulations relating to its tax activities.
- Maintaining an open and honest relationship with HM Revenue & Customs ("HMRC").
- Applying diligence and care in our management of the processes and procedures by which all tax related activities are undertaken and ensuring that our tax governance is appropriate.
- Using available incentives and reliefs in the conduct of our business.

How the UK Group manages its tax risks

The UK group is part of a US listed group and is subject to strict internal controls reviews to ensure adequate control procedures are in place under Sarbanes Oxley requirements.

The UK group has systems and processes in place to identify key tax risks. These are maintained on registers, and their materiality is assessed based on a matrix which records the potential impact on the Group and the relative likelihood of crystallisation.

The registers are subject to processes to ensure that they are continually reviewed and that the risks are adequately managed. The detailed log of these risk allows tax risks which have a high scoring on the corporate risk matrix to be raised up through the appropriate levels of management and ultimately to the Board, and if necessary, engagement with HMRC.

Where there is uncertainty in how the relevant tax law should be applied, external advice may be sought to support the UK Group's decision-making process.

The UK group approaches tax risk in the same manner as other commercial risks. The UK group has zero tolerance for tax evasion.

Tax planning

The finance teams of the UK group support business decisions by ensuring an awareness of the tax consequences of different options such that this contributes to the optimal business decision overall.

In cases where the tax guidance is unclear or the UK Group does not feel it has the necessary expert knowledge to assess the tax consequences adequately, external advice may be sought to support the UK Group's decision-making process.

Any tax planning undertaken supports the UK group's business activities and strategy or is, in the group's view, in line with the intention of relevant legislation (eg claiming group relief).

Working with HMRC

The UK Group is committed to the principles of openness and transparency in its approach to dealing with HMRC, and in particular the UK Group endeavours to:

- Make fair, accurate and timely disclosure in correspondence and returns, and respond to reasonable queries and information requests in a timely fashion.
- Seek to resolve issues with HMRC in a timely manner, and work with HMRC to resolve issues by agreement where possible.
- Be open and transparent about decision-making, governance and how tax advice supports overall business decisions.
- Ensure all interactions with HMRC are conducted in an open, collaborative and professional manner.