Tax whistleblowing policy

This policy supports the Group's commitment to maintaining high standards of tax governance, transparency and compliance as set out in the Group Tax Strategy.

Objectives
The Group is committed to conducting its tax affairs with honesty, integrity and transparency.
Colleagues are encouraged to speak up if they become aware of any actual or suspected breach of tax law, tax regulations or internal tax policies.
The Group will investigate all genuine concerns and will not tolerate retaliation against any person who raises a concern based on honest and reasonable belief.

Scope of policy
Concerns can be raised by any person who becomes aware of a potential tax wrongdoing including, but not restricted to, colleagues, directors, suppliers or consultants.

Types of concerns that should be reported
Tax Compliance examples include:

- Deliberate under-declaration of taxable profits, eg. underreporting cash sales
- Failure to account correctly for VAT
- Incorrect treatment of employment taxes including miscalculation of benefits-in-kind or company car values
- Claiming personal expenses as business costs

Tax Evasion and Fraud examples include:

- Creation of false invoices
- Falsification of tax returns
- Manipulation of accounting records
- Assisting customers or suppliers to evade tax
- Deliberate non-compliance with tax risk management controls
- Failure to follow tax approval procedures

Tax Errors and Genuine Mistakes
The purpose of the policy is not to penalise individuals who make genuine mistakes.
Colleagues are encouraged to report potential tax errors promptly so that corrective action can be taken before the error becomes a compliance issue.

Reporting Channels
Proof of wrongdoing is not needed prior to raising a concern; reasonable suspicion is sufficient.
Issues can be reported through the following channels:

- Your line manager
- Louise Appleby, Head of Group Financial Reporting and Tax (louise.appleby@timpson.com)
- Paresh Majithia, Finance Director (paresh@timpson.com)
- Any company director or board member
- The Timpson dedicated whistleblowing email address (taxconcerns@timpson.com)
- Directly to HMRC

Investigation process and record-keeping

1) Concern received
2) Initial assessment performed
3) Investigation assigned
4) Findings documented
5) Action implemented if required

6) Feedback provided where appropriate

Records will be kept of all tax whistleblowing reports, along with the investigation outcomes and actions taken.

Any significant tax concerns, investigations or outcomes will be reported to the Board.

Anonymous and confidential reporting

All concerns will be treated as confidential as far as reasonably practicable.

Concerns may be raised anonymously through taxconcerns@timpson.com. Anonymous concerns will be taken seriously and considered on the information available.

Anyone raising a concern anonymously should provide as much information as possible, including:

- The nature of the concern;
- When and where the matter occurred;
- The people or organisations involved; and
- Details of any documents, records or other information that may assist.

It may be more difficult to investigate an anonymous concern because we may be unable to ask further questions or clarify the information provided. We may also be unable to provide the person raising the concern with updates or information about the outcome.

Alternatively, an individual may provide their name but ask for their identity to be kept confidential. We will take reasonable steps to protect their identity and will only share it with those who need to know in order to consider or investigate the concern, or where disclosure is required by law or necessary for a fair investigation.

Complete confidentiality cannot be guaranteed in every case but, any information identifying the person raising the concern will be handled sensitively. No one will be subjected to retaliation, victimisation or detrimental treatment for raising a genuine concern under this policy. Any victimisation or retaliation as a result of the concern being raised will be treated as a disciplinary matter.

Protection will still apply even if an investigation ultimately finds no wrongdoing.

Policy created: *August 2026*
Review date: *August 2027 (or sooner if major tax or regulatory standards change)*