TAX STRATEGY

SYNLAB Holdco GmbH

Year ending 31 December 2025

TAX Strategy

Introduction

This Tax Strategy applies to SYNLAB Holdco GmbH and to the group of entities headed by SYNLAB Holdco GmbH (**SYNLAB Group**). This strategy applies for the year ending 31 December 2025. It will be reviewed, updated and republished annually.

This document, approved by the SYNLAB Holdco GmbH Management Board, sets out the SYNLAB Group's policy and approach to conducting its tax affairs and to dealing with tax risk, and is made available to all of the SYNLAB Group's stakeholders.

The Management Board has ultimate responsibility for tax governance and tax management. The day-to-day responsibility of the SYNLAB tax governance and management is delegated to the central tax department of SYNLAB ("Tax Department").

This document will be reviewed and updated annually by Tax Department and will be approved annually by the Management Board. It is initially effective for the year ending 31 December 2025 and will remain thereafter in effect, until any amendments to it are approved by the Management Board.

The SYNLAB Group is Europe's largest laboratory service provider and it has a growing presence in Latin America and a limited presence in the Middle East and Africa. The SYNLAB Group offers a full range of medical laboratory services for patients, practicing doctors, clinics, etc. Through these activities, we aim to create long-term value for our shareholders and to be a responsible corporate citizen and good employer.

Our business activities generate a substantial amount and variety of taxes, which form a significant part of our economic contribution to the countries in which we operate. We are committed to complying with tax laws in a responsible manner and to having open and constructive relationships with tax authorities.

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Group Tax Policy

1. Compliance with laws, rules and regulations

The Group is committed to complying with all applicable laws, rules, regulations, and reporting and disclosure requirements, including the EU Mandatory Disclosure Regime (DAC6), Country by Country Reporting and OECD Pillar Two regulations, wherever there is a requirement to do so as a result of our business presence and transactions.

The Group believes that it should pay the amounts of tax legally due in any territory, and at (or before) the time at which it is legally due. The Group will use its best judgement in determining whether it is appropriate to use whichever reliefs and incentives, as provided by the relevant tax code, are available.

We aim to file all relevant tax returns in all countries in accordance with prudent and established tax return filing positions. We will form strong tax technical positions and we will fully understand the business, commercial and regulatory context of transactions before filing the results of such transactions.

Where tax law is unclear or subject to interpretation, professional advice or advance clearance from tax authorities may be sought to minimize the risk that the Group's position leads to dispute.

Where tax enquiries or audits are opened, we adopt a proactive approach to the provision of information to tax authorities in order to reach prompt resolution of any matters under review.

2. Consistency with Group strategy

Tax decisions will always be made in a manner which is consistent with and complements the Group's overall business and commercial strategy.

Key business decision makers should be made aware of the tax consequences of such decisions on a timely basis, in the best interests of the Group and in line with this Tax Strategy. The Tax Department will partner with the businesses to ensure there is that consistency.

3. Governance, Assurance and Tax Risk Management

Responsibility and accountability for the Group's tax affairs is clearly defined within the Group, and decisions will be taken at an appropriate level. Tax risks are managed within the limits set out by the SYNLAB Holdco GmbH Management Board.

The Chief Financial Officer and the Group Head of Tax are responsible for implementing the Tax Strategy and for ensuring that it is adhered to. The SYNLAB Group has a Tax Department that reports to the Chief Financial Officer. The Group Head of Tax, and all members of the Tax Department, have appropriate professional qualifications and experience commensurate with the responsibilities required for their role. All members of the Tax Department are provided with training as required to facilitate performance of their roles and to achieve their personal development objectives. All Tax Department members and all finance personnel are and will be required to proactively operate in line with the Tax Strategy.

All finance personnel employed by the Group are responsible for complying with the principles and strategy set out in this document and with wider tax governance requirements. We are also committed to providing training to non-tax personnel in key areas such as HR, finance, and business affairs to ensure that they are able to inform the tax team of relevant developments, and to make decisions with tax consequences in the best interests of the Group and in line with this strategy.

In reviewing the risks of a tax action or decision, always bearing in mind the requirements of the Group Tax Strategy, the following will be considered:

- the requirements of our Code of Conduct, dated 25 October 2024, in particular those policies covering legal and ethical conduct,

- the maintenance of our corporate reputation, in particular the principles embodied in our Code of Conduct and the high levels of integrity of the Group notably mentioned in the ESG Report,

- the tax benefits and impact on the Group's reported result comparative to the potential financial costs involved, including the risk of penalties and interest, and

- the wider consequences of potential disagreement with tax authorities, and any possible impact on relationships with them.

The SYNLAB Group has implemented an internal control system (ICS), to identify and assess internal controls which has enhanced all processes including tax ones.

Both the Group Head of Tax and Chief Financial Officer regularly report to the Audit and Risk Committee (which is a subcommittee representing the Supervisory Board) on tax matters and possibly, on any risks which might have been identified.

4. Attitudes to tax planning

In structuring our commercial activities and complying with the tax laws of the countries within which we operate, we will have regard to our stated objective of maximizing shareholder value. Any tax planning undertaken will have commercial and economic substance and will have regard to the potential impact on our reputation and broader goals. We will not undertake planning that is contrived or artificial.

Where alternative choices exist to achieve the same commercial result the most tax effective approach in compliance with all relevant laws is likely to be considered. This is in line with our Code of Conduct. However, we will always strive to fulfill our primary objective of paying the appropriate amount of tax at the right time from a legal perspective and maintaining our strong reputation with tax authorities. Consideration is also given to the Group's reputation, brand, and corporate and social responsibility when considering business developments, and associated tax consequences.

As noted above, we will form strong tax technical positions and we will fully understand the business, commercial and regulatory context of transactions before undertaking such transactions. Where tax law is unclear or subject to interpretation, professional advice or advance clearance from tax authorities may be sought to ensure that the Group's position is technically supported and in line with market practice.

Where tax advice may be sought from external advisors in respect of material transactions, external advisors will be appointed (subject to the Group's policy on audit / non-audit services and the SYNLAB Supplier Code of Conduct) and agreeing terms of engagement approved by the Group's Legal and Finance departments where appropriate.

Such terms must adhere to the Group's corporate governance and risk management policies, including the Group's Code of Conduct. Where the Group outsources tax work to external tax advisors (including elements of compliance), the Group Head of Tax will approve and ensure that the principles in this document are adhered to.

5. Relationship with tax authorities

The Group is committed to the principles of openness and transparency in its approach to dealing with tax authorities. All dealings with tax authorities and other relevant bodies will be conducted in a collaborative, courteous and timely manner. We are prepared to litigate where we disagree with a ruling or decision of a tax authority, but our aim will always be to strive for early agreement on disputed matters, and to achieve certainty wherever possible.

6. UK specific matters

The UK members of the SYNLAB Group, as listed in Appendix 1, regard this tax strategy as meeting their requirements in accordance with UK legislation contained in paragraphs 19 and 25 of Schedule 19 to Finance Act 2016 (the "Schedule").

The strategy has been published in accordance with paragraph 16(4) of the Schedule by being posted on the Group's website.

References to 'tax', 'taxes' or 'taxation' include the taxes and duties set out in paragraph 15(1) of the Schedule and to all corresponding worldwide taxes and similar duties in respect of which the Group has legal responsibilities. References to 'tax authorities' include HMRC in the UK along with all other tax and government authorities in the countries in which the Group operates.

The UK members of the SYNLAB Group, commit to:

- adopt open and collaborative professional relationships with HMRC;
- engage in full, open and early dialogue with HMRC to discuss tax planning, strategy, risks and significant transactions;
- make fair, accurate and timely disclosure in correspondence and returns, and respond to queries and information requests in a timely fashion;
- seek to resolve issues with HMRC in real time and before returns are filed if possible, and, where disagreements arise, work with HMRC to resolve issues by agreement (where possible);
- be open and transparent about decision-making, governance and tax planning;
- have best intentions to structure transactions to give a tax result which is not inconsistent with the economic consequences (unless specific legislation anticipates that result), nor contrary to the intentions of Parliament; and
- interpret the relevant laws in a reasonable way, and ensure transactions are structured consistently with a co-operative relationship.

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Appendix 1

During the year ended 31 December 2025, the UK members of the SYNLAB Group included:

- SYNLAB Ltd
- SYNLAB Holdco Ltd
- SYNLAB Unsecured Bondco PLC
- SYNLAB Bondco PLC
- Labco UK Group Ltd
- Integrated Pathology Partnerships Ltd
- IPP Facilities Ltd
- IPP Analytics Ltd
- SYNLAB UK Ltd
- The Christie Pathology Partnership LLP
- CPP Facilities LLP
- E4Law Ltd (disposed 30 September 2025)
- Labco Diagnostics Ltd (dissolved 6 April 2025)
- SYNLAB Laboratory Services Ltd (disposed 30 September 2025)
- Synnovis Group LLP
- Synnovis Services LLP
- Synnovis Analytics LLP
- SYNLAB Health For You Ltd