

Woodcrafters UK Co. Ltd. UK Tax Strategy  
Pursuant to UK Finance Act 2016, Part 2  
Publication of Tax Strategies

Woodcrafters UK Co. Ltd. is a member of the MasterBrand, Inc. Multinational Enterprise (“MNE”) Group (“MBC Group”). MasterBrand, Inc. (“MBC” or “Company”) is a leading manufacturer of residential cabinets in North America and is quoted on the New York Stock Exchange. The tax strategy for Woodcrafters UK Co. Ltd. is publicly provided pursuant to the UK Finance Act 2016, Schedule 19, Part 2, paragraph 22(2), prescribing information required to be published as provided in Part 2, paragraph 23, Content of a company tax strategy. It is published for the financial year ended 30 November 2024.

Pursuant to the UK Finance Act 2016, Part 2, par. 23(1), the following principles are provided:

- (a) The approach of Woodcrafters UK Co. Ltd. to risk management and governance arrangements in relation to UK taxation,
- (b) the attitude of Woodcrafters UK Co. Ltd. towards tax planning (so far as affecting UK taxation),
- (c) the level of risk in relation to UK taxation that Woodcrafters UK Co. Ltd. is prepared to accept, and
- (d) the approach of Woodcrafters UK Co. Ltd. towards its dealings with Her Majesty’s Revenue and Customs (“HMRC”).

The tax strategy of Woodcrafters UK Co. Ltd. is to ensure compliance with all applicable UK tax laws, treaties, regulations, and other tax guidance while effectively managing its tax risks and governance arrangements.

Approach to risk management and governance arrangements in relation to UK taxation

MBC Group’s compliance and governance principles are documented in global policies that include Code of Business Conduct & Ethics, Compliance Reporting, Human Rights, and Anti-Corruption including the Foreign Corrupt Practices Act. All MBC Group employees are responsible for being in full compliance with its global policies and procedures, including compliance requirements with respect to UK tax.

Oversight and monitoring of UK risks and governance arrangements are the responsibility of the MBC Group tax team, comprised of the VP of Tax and other tax team members in the U.S.

Reputational risk governance and avoiding adverse reputational risks are embedded into the internal policies, training and governance that are applicable for the MBC Group.

Our management of tax risks includes:

- Global transfer pricing for the MBC Group is a centralized headquarters-led activity, supported by global external advisors, resulting in consistent transfer pricing methodologies and documentation. This centralized approach relies on the concept of arm’s length pricing that minimizes unilateral, bilateral, and multilateral transfer pricing tax risks that are inherent in the business operations.
- Reviewing and monitoring domestic and international tax legislation, case law, guidance, and governance.
- Continuous review and enhancement of policies supporting tax compliance and governance.
- Ongoing technical tax and general business training and development of our employees to ensure our compliance and governance activities are performed with appropriate diligence and technical expertise.



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MBC Group's tax risk and governance is the responsibility of MBC Group's management with oversight by its Board of Directors, including the Audit Committee. The Audit Committee reviews MBC Group's financial information provided to the public and shareholders, internal controls, financial and risk management policies, and oversees financial reporting processes and the Company's audited financial statements. The VP of Tax regularly informs the Audit Committee of relevant tax risks as part of global governance.

## Attitude towards tax planning in relation to UK taxation

UK tax planning arrangements are aligned with the operational needs of our business, as tax is only one factor that is considered when making business decisions. Additionally, UK tax planning arrangements are reviewed and approved by MBC Corporate Tax (including applicable external tax advisors addressing UK tax concepts) and other MBC Group headquarter functions to ensure that the related UK tax risks have been reviewed, minimized and are in alignment with MBC Group's global principles, including all aspects of tax governance and documentation.

## Level of risk in relation to UK taxation that Woodcrafters UK Co. Ltd. is prepared to accept

Tax and reputational risk governance for the MBC Group, including Woodcrafters UK Co. Ltd., are overseen by the MBC Corporate Tax and senior leadership. The MBC Group prepares its income tax returns in compliance with UK tax laws.

MBC Group policies and governance are in alignment with the Organization for Economic Cooperation and Development ("OECD") Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2022. Additionally, OECD Updated Guidelines for Multinational Enterprises on Responsible Business Conduct, May 2023, Chapter XI, Taxation, provides guidance for corporate citizenship in taxation and includes the following commitments:

- Cooperation with HMRC and other tax authorities, providing information that is relevant or required by law,
- Timely payment of tax liabilities, and
- Transfer pricing methodologies based upon the arm's length principle, an internationally accepted standard.

## Approach of Woodcrafters UK Co. Ltd. towards its dealings with HMRC

The principles of MBC Group will be respected in all aspects of tax compliance, governance, and relationships with HMRC.

The MBC Group acts with the highest level of integrity at all times, focused on preserving our positive reputation with governments, tax authorities, and other global stakeholders. Accordingly, Woodcrafters UK Co. Ltd. interacts with HMRC in a transparent and respectful manner, including tax compliance, disclosures, and related documentation.