



Toll Group Tax Compliance Policy

Overview

This policy sets out Toll Group's approach to tax.

Scope

This policy applies to Toll Group, including all Toll Group employees and any external persons who undertake work for, or on behalf of, Toll Group.

Principles

The Board of Toll Group has endorsed the following principles governing Toll Group's approach to tax:

- Commitment to acting as a good corporate citizen, maintaining shareholder value and ensuring the legally correct amount of tax is paid;
- Ensuring compliance with the tax laws in each jurisdiction in which Toll Group operates and ensuring that all tax positions have at least a reasonably arguable position;
- Commitment to operating with transparency including accurate disclosures to revenue authorities and maintaining an open and co-operative relationship with revenue authorities;
- Operating a model that identifies tax risks as they arise and provides for escalation of tax risks to the Audit & Risk Committee; and
- Maintaining the integrity and reputation of Toll Group at all times.

Toll Group manages its tax risks using the Tax Risk Management Framework endorsed by the Audit & Risk Committee.

Tax risk management for Toll Group involves the process of identifying and assessing all tax risks in order to:

- Provide assurance that relevant tax questions are considered as part of every commercial decision;
- Ensure that tax risks are appropriately escalated within Toll Group;
- Ensure that documented controls and processes exist to mitigate potential tax risks; and
- Ensure that identified tax risks are appropriately mitigated.

All Toll Group businesses are responsible for:

- Ensuring that their local country tax obligations are met;
- Escalating all tax risks to Group Tax when those risks are identified;
- Advising Group Tax as soon as possible of any tax audits, reviews and/or investigations;
- Escalating any other matters which should be considered by Group Tax;
- Identifying and reporting any changes in tax law to Group Tax and ensuring clear risk ownership;
- Ensuring that all Toll Group document retention requirements are met;
- Adhering to all Toll Group operational tax policies and procedures; and
- Ensuring that the Tax Risk Management Framework is complied with.

Compliance and Implementation

It is the responsibility of senior management to ensure that this Policy is disseminated and fully understood at every level throughout Group.

All users must abide by the requirements set out in this policy. Users found to have violated or attempted to violate these requirements may be subject to disciplinary action, up to and including termination of employment. Additionally, Toll reserves all rights to take legal action(s), where required.

Effective: 1 July 2026

Owner: Senior Vice President Global Tax

*This Policy is an internal Toll document periodically updated as required and is mandatory for all employees. It is **STRICTLY CONFIDENTIAL** and must not be shared externally without prior consent from Group Compliance.*



Breaches to this Policy

Users/Employees must report any alleged breaches of the above requirements to their managers, an Eligible Recipients (as defined in Toll Whistleblower Policy [Toll Whistleblower Policy](#) and to [Group Compliance](#). For serious breaches, including allegations of fraud and improper conduct, users are encouraged to contact the [Toll Disclosure Hotline](#).

All suspected breaches will be investigated, and appropriate disciplinary and remedial action will be taken.

Further Information

For further information, please contact Group Tax.

This document can be found on the [Group Policy SharePoint page](#).

A handwritten signature in black ink, appearing to read "R. Reiter".

Robert Reiter
Group Managing Director
Toll Group
1 July 2026