



CCI UK Tax Strategy

Introduction

This statement sets out the tax strategy of the UK sub-group of Castleton Commodities International LLC ("CCI"). The UK sub-group currently consists of the following entities:

- Castleton Commodities UK Limited
- Navires Fuels Limited
- CCI European Power Asset Holdings LP
- CCI European Power Asset Funding Co LP
- CCI European Power Asset Holdings Promote Co LP
- CCI European Asset Holdings II LP
- CCI European Power Asset Holdings Promote Co II LP
- Lower 48 Energy BESS Limited
- Lower 48 Barton BESS Limited

who are hereafter collectively known as the “UK Group”.

In making this strategy available, the UK Group is fulfilling its responsibilities under Schedule 19 of the Finance Act 2016. This approach to tax is relevant for the current financial year and continues to apply until it is superseded.

Our approach to risk management and governance arrangements in relation to UK taxation

Effective risk management is a core component of the way in which CCI carries out its business. It allows us to pursue commercial opportunities across the globe with the confidence that we can quantify and understand the risks we take. Our approach is therefore no different when dealing with taxation for the UK Group.

The UK Group’s tax strategy is maintained and executed by our global tax team, a collaborative group of experienced, qualified professionals who work closely with the CFO and other senior management. The team collectively oversees tax compliance, planning, and risk management across the UK Group. Where necessary, the team engages with external advisors, including Big Four accounting firms and legal specialists, to ensure robust and accurate tax filings and compliance with UK and international tax obligations.

Our attitude towards tax planning in respect of UK taxation

The UK Group manages tax affairs in a proactive manner that seeks to maximize shareholder value. However, it does not enter into artificial arrangements that lack commercial purpose in order to secure a tax advantage. If a position is uncertain, the UK Group may obtain third-party advice in order to gain clarity or support for a particular stance or approach.

The level of risk in relation to UK taxation that the UK Group is prepared to accept

Our aim is to ensure full compliance with all statutory obligations and, as a consequence, to attempt to minimize risk wherever possible. Where there is any doubt in relation to tax risk, the matter is escalated to the CFO and/or the Board for consideration.

Our approach to dealing with HMRC

The UK Group engages with HMRC in a timely, transparent, and cooperative manner. We maintain regular dialogue with the tax authorities on routine compliance matters and seek to resolve any issues proactively. Where appropriate, we provide full disclosure on significant transactions or uncertain tax positions and respond promptly to HMRC enquiries. Although a Customer Compliance Manager has not yet been appointed, we aim to build and maintain a professional and constructive relationship with HMRC, based on transparency, trust, and mutual understanding.