



Metro Bank Holdings PLC

Tax Strategy for the Year Ending 31 December 2025

Our tax strategy is set out below, which applies to Metro Bank Holdings PLC and its UK subsidiaries (“Metro Bank”). This has been published in accordance with the requirements of Paragraph 16(2), Schedule 19 of the Finance Act 2016 and applies to taxes borne and collected by Metro Bank in the UK. Metro Bank has no overseas subsidiaries, and all taxes are paid in the UK.

Metro Bank is subject to a range of UK taxes, including corporate income tax, employment taxes, business rates, customs duties, excise duties, stamp duties and VAT. We also administer and collect taxes on behalf of HMRC, including employee payroll taxes and other indirect taxes.

Our Approach to Tax Risk Management and Governance

Metro Bank is committed to maintaining strong governance and transparent tax practices. Responsibility for tax matters ultimately rests with the Board of Directors, with day-to-day oversight delegated to the Chief Financial Officer (CFO) as the Senior Accounting Officer. The CFO is supported by the Finance Director – Financial Control and appropriately qualified external advisers where required.

We maintain a robust internal control environment to identify, assess and manage tax risks.

Metro Bank’s Audit Committee monitors the integrity of our financial reporting systems, internal controls and risk management framework, including those relating to taxation.

Where tax law is unclear or subject to differing interpretations, we seek external advice to ensure decisions are fully informed and consistent with Metro Bank’s risk appetite.

Our Attitude Toward Tax Planning

Metro Bank’s approach to tax planning is guided by the principles of commercial substance, transparency, and compliance. We structure our business and undertake transactions in a way that:

- Supports the Bank’s strategic objectives;
- Reflects genuine commercial activity;
- Complies with both the letter and the spirit of UK tax law;
- Protects the Bank’s reputation and stakeholder interests.

While Metro Bank claims reliefs, incentives and allowances available under UK legislation, we do not engage in artificial or aggressive tax planning. Any tax planning undertaken is

aligned to commercial realities and subject to governance approval where appropriate.

We do not use tax havens or contrived structures for the purpose of reducing UK tax liabilities.

Level of Acceptable Tax Risk

Metro Bank adopts a prudent and risk-averse approach to tax. We do not undertake transactions whose sole purpose is to abuse the tax system or to generate a tax outcome inconsistent with the underlying economics of the commercial transaction.

We value certainty in our tax affairs and we regularly seek advice from external tax advisors, particularly in relation to complex or uncertain tax matters.

We accept that some tax risk is unavoidable, given:

- The complexity of UK tax legislation;
- The pace of regulatory and legislative change;
- The need for judgement in some technical areas.

Where material risks arise, they are escalated through the governance structure and managed in accordance with the Bank's established risk frameworks.

Our Approach to Working with HMRC

Metro Bank seeks to maintain a proactive, open and cooperative relationship with HMRC. We are committed to:

- Timely, accurate and transparent filing of tax returns;
- Providing full and relevant information to HMRC when requested;
- Engaging constructively to resolve any areas of dispute;
- Discussing areas of uncertainty in real time, where appropriate.

We comply with HMRC's Code of Practice on Taxation for Banks and act in a manner consistent with its objectives.