

Tax Strategy - Year Ended 31 December 2025

The following Tax Strategy for the year ended 31 December 2025 is published by Borr Drilling Limited on behalf of its UK subsidiary companies and UK sub-groups, as required under paragraph 19(2) of Schedule 19 of the UK Finance Act 2016.

Introduction

Borr Drilling is committed to conducting its global business in a responsible manner, including managing its tax affairs efficiently and in compliance with all applicable laws and regulations.

Borr Drilling is committed to maintaining robust governance and risk assessment and management processes to ensure the effective management of tax-related risks including design and implementation of processes and controls to address, mitigate and reduce such risks to a tolerable level. Our Tax Strategy was developed consistent with our Values, which are published on our website and are central to everything we do:

- *Adaptability* - Embracing adaptability as a core value, our team thrives in dynamic environments, proactively learning and evolving to meet challenges with resilience and innovation.
- *Teamwork* - Championing teamwork as a fundamental value, we leverage collective strengths, foster collaboration, and achieve excellence through shared goals and mutual support.
- *Integrity* - We prioritize honesty, transparency, and ethical conduct, fostering a culture of trust and accountability in all our endeavours.
- *Commitment* - We are dedicated to nurturing a culture centered on care, with employee safety as our top priority in the workplace. This commitment is equally strong towards our clients, as we constantly aim to achieve greater operational efficiency.

Governance arrangements and risk management in relation to UK taxation

Governance framework / oversight and involvement of the Board of Directors of Borr Drilling Limited (“Board”)

Responsibility and accountability for Borr’s tax affairs are clearly defined. The Senior VP – Tax reports directly to the Chief Executive Officer. The Senior VP – Tax is a member of the Borr Executive Management. Executive Management reports on matters of taxation to the Board, as appropriate. In addition, the Senior VP – Tax reports on taxation matters to the Audit Committee of the Board on a quarterly basis.

The Senior VP – Tax is supported by the Borr Tax Department, which is adequately staffed by dedicated and appropriately qualified in-house tax professionals. The Borr Tax Department provides the advice and guidance necessary to ensure compliance with applicable laws, obtaining advice from external tax advisors where and when appropriate.

Identification and mitigation of tax risks

The Borr Tax Department employs various risk management control processes and systems. This includes compliance and risk monitoring systems.

Diligent professional care and judgement are employed to assess tax risks in order to arrive at well-reasoned conclusions on how the risks should be managed. Where there is uncertainty as to the application or interpretation of tax law, appropriate written advice is obtained from third party tax advisers to support the decision-making process.

Overriding considerations in decisions involving tax risk

In evaluating tax actions and making decisions involving tax risks, we consider the following matters:

- the legal and fiduciary duties of directors and employees,
- our Values,
- the reputation and integrity of Borr Drilling Limited and its status as a publicly listed corporation, and
- the consequences of potential disagreement with HMRC and the impact on our relationship with them.

Our attitude towards tax planning

We undertake responsible tax planning that supports our operations and reflects the underlying commercial and economic activity. We consider it appropriate to organize and conduct our operations in a tax efficient manner, which is consistent with our obligation to protect assets for the benefit of our shareholders. As such, we will claim properly available reliefs and take advantage of incentives and other opportunities available under the legislation and related HMRC guidance. We are committed to meeting our obligation to pay all amounts of tax legally due in accordance with the applicable laws, and to fulfilling our reporting and disclosure obligations.

In circumstances where there is uncertainty surrounding the interpretation or applicability of tax legislation, particularly when materially different tax outcomes may result, we will seek opinions from tax advisors and initiate dialogue with HMRC.

Level of risk in relation to UK tax that we are prepared to accept

We have a low tolerance for tax risk, and we are fully committed to complying with all applicable tax laws. We do not enter into artificial tax arrangements that lack a commercial purpose and we seek to minimize the risk of dispute with HMRC by being open and transparent about our tax matters. Where there is material doubt as to the appropriate tax treatment of a particular transaction, we seek advice from one or more leading tax advisors and/or seek to resolve the uncertainty through dialogue with HMRC.

Our approach towards dealings with HMRC

We endeavor to maintain collaborative relationships with HMRC and engage in transparent communication.

HMRC have published a “Framework for Cooperative Compliance” that highlights a set of principles that both large businesses and HMRC should engage and work within. Our Tax Strategy encompasses full adoption of these principles, including a commitment to:

- an open, collaborative, and professional relationship with HMRC,
- engage in open and early dialogue with HMRC relative to tax planning, strategy, risks, and significant transactions,
- respond to queries, information, and clearance requests in a timely fashion and to ensure that HMRC are informed about how issues are progressing, especially
- those that are complex or difficult,
- seek to resolve issues in real-time and before tax returns are filed, where possible,

- make fair, accurate and timely disclosure in tax returns, reports, and documents that we file with, or submit to, HMRC,
- proactively work with HMRC to seek to resolve disagreements and other issues (where possible),
- maintain a professional working relationship with HMRC when recourse to the courts is required to resolve disagreements,
- be open and transparent about decision-making, governance, and tax planning,
- reasonably believe that transactions are structured to give a tax result which is not inconsistent with the economic consequences, nor contrary to the understood intentions of Parliament, and
- interpret the relevant laws in a reasonable way, and ensure transactions are structured consistently with a co-operative relationship