EU Public Country-by-Country Reporting (Public CbCR), Report on Income Tax Information for SEGRO plc Group (Spanish subsidiaries)

Financial Year Ended 31 December 2025

1. General Information

- Name of the ultimate parent undertaking: **SEGRO plc with its registered office in 1 New Burlington Place, London, England, W1S 2HR**
- Financial year – start date**: 01/01/2025**
- Financial year – end date: **31/12/2025**
- Reporting currency: **EUR**

Basis of Preparation: The information contained within this report is based on the Spanish consolidated subsidiaries of SEGRO plc only. The data is sourced from the statutory accounts of the Group's Spanish subsidiaries, prepared in accordance with the Plan General de Contabilidad and presented in accordance with the requirements of Directive (EU) 2021/2101 as transposed into Spanish law by Law 28/2022.

2. Income Tax Information by Jurisdiction

Tax jurisdiction	**Country code**	**Revenues**	**Profit (loss) before income tax**	**Income tax paid**	**Income tax accrued**	**Accumulated earnings**	**Number of employees**
		EUR	**EUR**	**EUR**	**EUR**	**EUR**	**FTE**
Spain	ES	12,350,363	3,648,518	176,522	12,308	12,811,087	12

3. List of subsidiaries and activities

Member state or Tax jurisdiction	**Country code**	**Name of each subsidiary undertaking in the Member state or tax jurisdiction**	**Brief description of the nature of activities in the Member State or tax jurisdiction**
Spain	ES	1. SEGRO Spain Management S.L. 2. SEGRO (Spain Energy) S.L. 3. SEGRO Properties Spain S.L. 4. SEGRO Investments Spain S.L. 5. SEGRO Spain Spare 1 S.L. 6. SEGRO Spain Spare 2 S.L. 7. SEGRO Spain Spare 3 S.L.	• Administrative, Management or Support Services; • Holding Shares or Other Equity instruments; • Provision of Services to Unrelated Parties; and • Other

4. Omitted information

No information has been omitted from the reported data under the safeguarding clause for commercially sensitive data.

5. Further information

Background

This report is published to meet the requirements of the EU Public Country by Country Reporting ("Public CbCR") Directive (Directive (EU) 2021/2101), as transposed into Spanish domestic law.

Under the Public CbCR regime, multinational enterprises and groups with consolidated revenues exceeding €750 million and operating within the EU are required to publicly disclose specified income tax and related information on a country-by-country basis, with the objective of enhancing corporate tax transparency. SEGRO is committed to transparency in its tax affairs and to complying fully with all applicable public reporting obligations.

Scope of this Report

This Public CbCR Report of the SEGRO plc consolidated group (the "Group") relates solely to the Group's operations in Spain for the financial year ended 31 December 2025.

Spain is subject to an earlier Public CbCR domestic filing timetable and therefore this report contains all information in the possession of, obtained by, or acquired by the reporting subsidiary undertaking SEGRO Spain Management S.L.

At the date of publication, the ultimate parent undertaking (SEGRO plc) had not yet made available to the reporting subsidiary the information required for Public CbCR purposes in respect of all other jurisdictions. The complete report covering all jurisdictions will be published on the SEGRO plc website once available and before the filing deadline for the remainder of the Group entities of 31/12/2026.

Spanish SOCIMI Regime

The Group's Spanish property investment activities are conducted through a Spanish Sociedad Anónima Cotizada de Inversión en el Mercado Inmobiliario ("SOCIMI"). The SOCIMI regime is broadly equivalent to a Real Estate Investment Trust and is subject to mandatory distribution requirements.

Under the SOCIMI regime, qualifying rental income is exempt from Spanish corporate income tax at the entity level, provided it is distributed within one year of realisation. Qualifying capital gains are exempt provided 50% are distributed within one year of realisation and the remaining 50% is either distributed or reinvested within a further three-year period.

Distributions made by the SOCIMI to SEGRO plc are subject to Spanish withholding tax at a rate of 15%. This withholding tax is recognised as an expense in SEGRO plc's accounts and will therefore be reflected in the United Kingdom CbCR tax information, rather than in Spain. As a result, the effective corporate income tax rate in Spain is much lower than the Spanish corporation tax rate of 25%.

When the Spanish withholding tax on distributions is considered alongside the exemption of income at the SOCIMI level, the overall tax contribution in respect of the Group's Spanish property activities is consistent with the policy intent of the SOCIMI regime and the UK-Spain double tax treaty.

This report was approved by the Board of Directors of SEGRO Spain Management S.L. on 28/06/2026.