



## UK Tax Strategy

March 2023

### Scope

This UK tax strategy applies to UK 111 Limited and all of its subsidiaries, which together make up the Sofina Europe Group (herein referred to as 'the Group').

The Group is a part of Sofina Foods Inc, a Canadian based manufacturer of primary and further processed protein products.

The Group is primarily engaged in the production and sales of pork and seafood related products, distributed through the UK and internationally.

This strategy is published in accordance with para 19(2), Schedule 19, Finance Act 2016 relating to the financial year ending 25 March 2023 and applies from the date of publication until it is superseded.

### Aim

The Group is committed to full compliance with all statutory obligations and full disclosure to relevant tax authorities.

The management of the Group's tax affairs is aligned to the fundamental principles and approach to taxation and the wider overall high standards of governance of Sofina Foods Inc.

Documenting this UK Tax Strategy provides direction and control over the UK tax activity of the Group.

### Governance in relation to UK taxation

#### *Risk Management*

Ultimate responsibility for ensuring that the Group's UK tax affairs are conducted in accordance with this UK Tax Strategy rests with the Board of UK 111 Limited ('the Board').

The Board delegates executive responsibility to the Group's Chief Financial Officer ('CFO').

Day-to-day responsibility of the Group's tax affairs is delegated to the Group Head of Tax who reports to the Group CFO and the Global Senior Vice President Treasury and Tax for Sofina Foods Inc.

The Group Head of Tax has responsibility for the Group Tax Department, which is staffed with individuals who have the necessary experience for the role they are undertaking. The Group Tax department work closely with and are supported by the Group Finance Team.

The work of the Group Tax Department is supported with documentation that evidences the facts and the conclusions reached during the course of their work, and where necessary the Group Tax Department take additional advice from appropriately qualified external tax advisers.



## **Governance in relation to UK taxation (continued)**

### *Systems and Controls*

All applicable UK laws, rules and regulations are observed and diligent professional care and judgement is applied in arriving at any conclusions and assessment of uncertain tax positions.

The Group operates appropriate systems, controls and processes to manage taxes effectively. Processes are regularly reviewed to ensure they remain robust and compliant.

Wherever possible, risks of errors are mitigated by having segregation of duties, for example, segregating the preparation and review of tax returns.

### **Attitude towards tax planning and level of risk**

All transactions are aligned with the commercial and economic activity of the Group's operations.

The Group seeks to reduce the level of tax risk arising from its operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations.

The Group manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax at the right time.

When entering into commercial transactions, the Group seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation. The Group does not undertake tax planning unrelated to such commercial transactions.

Consideration is always given to the Group reputation, brand and corporate responsibilities when considering tax initiatives.

Where the tax impact of a transaction is complex or where the relevant tax legislation is unclear, the Group will seek external third-party advice to ensure that the tax position adopted is expected to be acceptable to HMRC.

### **Relationship with HMRC**

The Group strives to have a transparent and constructive working relationship with HMRC through regular meetings and communication in respect of developments in its business, including current, future and retrospective tax risks, and interpretation of the law in relation to all relevant taxes.

The Group ensures that HMRC is kept aware of significant transactions and changes in the business and seeks to discuss any tax issues arising at an early stage.

When submitting tax computations and returns to HMRC, the Group discloses all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain.

Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.

*This UK Tax Strategy was originally approved by the Board of UK 111 Limited on 21 March 2023 for and on behalf of the Group.*