



TAX STRATEGY

AMFRESH Group UK Tax Strategy

This statement is prepared in accordance with the requirements of Part 2, schedule 19 of the Finance Act 2016 in relation to the Financial Year Ended 31st August 2025. This statement, which is approved by the Board of Directors of AM FRESH Group UK Limited, sets out the policy and approach to managing Tax Compliance and the Tax Risks of AMFRESH Group UK Limited and its subsidiaries both in the UK and Overseas. Our main place of business is, however, the UK and this is where most of our taxes are paid.

Approach to UK Tax Risk Management and Governance

The Group's approach to Tax Risk Management and Governance is embedded within our Company Values. We believe that Corporate Social Responsibility is key in all areas of our business and especially in our dealings with Tax Risk Management and Governance.

We believe it is our responsibility to fairly contribute taxation where required and we have no intention of following a Tax Strategy that could question the Group's reputation or damage its standing in our marketplaces.

Where the option is available, we work hard to simplify our taxation reporting. Our Chief Financial Officer, who is also our Senior Accounting Officer (SAO), helps our Board deliver decisions over Tax Management and Risk Strategy. The strategy is reviewed at Board level and commented upon in the SAO report. The SAO ensures procedures and reports are compliant through regular process review.

Our policy on taxation delivers clear guidance to be used as a framework for tax decision making. Internal reporting is staffed by qualified accountants, with experience supporting compliance with our taxation policy, and ensures that management attention is given to this important area. Staff are provided with regular training to ensure they are prepared for changes in regulations and where doubt exists external taxation specialists are engaged to ensure compliance. We have put in place measures to follow Transfer Pricing Policy, Base Erosion and Profit-Sharing regulations. This ensures that all intercompany transactions are carried out as if at arm's length with a third party.

Our systems and controls are built around our use of our Enterprise Resource Planning (ERP) system. We ensure our ERP system is frequently updated, and that all rates and calculations the system performs are monitored and reviewed to ensure they are compliant.

The Group's largest tax risk exists in transactions outside of day-to-day trading, and professional taxation expertise will always be sought to ensure compliance.

Attitude towards Tax Planning

Our Group's Taxation Planning and internal framework ensures that we comply with local taxation regulations in the UK and Overseas. By following these principles, as supported by our Company Values, we pay the appropriate amount of tax in the relevant jurisdiction and in the correct timeframe.

We aim to be fully compliant in all taxation transactions and ensure this by Tax Planning for genuine commercial activity only.

We aim to base our tax decisions on the best available advice. If we encounter new business opportunities that could expose us to unfamiliar areas for our Tax Planning, we will look to seek external Taxation Planning advice.

Acceptable Tax Risk

As a Group we minimise all Taxation Risk where possible. This prudent behaviour matches our Accounting Principles and ties in with our Company Values. We work closely with HMRC and the rest of Tax Administrations in all the countries where we operate. And our Customer Compliance Manager (CCM) to ensure that we minimise any risk and continue to meet the Business Risk Review Criteria, so we maintain our low-risk status defined by the Tax Administrations mentioned.

The larger group outside of the UK applies the same principles and policies to tax planning as those we apply within the AMFRESH Group UK Ltd. Although those Business Stakeholders may not be aware of all Taxation Risks relating to the UK, our Strategic Board Overview, SAO review and Professional Ethics of our experienced and qualified accounting team ensure we can advise the stakeholders of the requirements and compliance to reduce the level of taxation risk.

Working with HMRC

Part of our Taxation Strategy is to have open and transparent relationships with HMRC and our CCM. We ensure we communicate clearly with HMRC and are proactive with our communication.

We understand our requirement for relevant taxation and duties and ensure we communicate any material uncertainties with HMRC at the earliest opportunity. Any area where we have doubts or require clarification, we will contact our CCM or HMRC by any of the various methods to resolve our queries.

Due to our low level of Business Strategy Change affecting Tax Planning, we ensure that we can evidence the accounting arrangements in place for taxation.

Paul O'Neill

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Chief Financial Officer (AMFRESH UK & Northern Europe)