

# TAX STRATEGY

## INTRODUCTION

The following document sets out the Berry Gardens group tax strategy in accordance with Berry Gardens Growers Limited reporting obligations under Schedule 19 Finance Act 2016 paragraph 16(2).

This tax strategy covers all companies within the group, namely:

- Berry Gardens Growers Limited
- Berry Gardens Limited
- Go Cherry Limited
- KG Fruit Limited
- Kentish Garden Limited
- Kentish Garden Marketing Limited
- KG Growers Limited

The tax strategy covers all UK taxes, including but not limited to, corporation tax, income tax, NIC, and VAT as well as other various taxes paid by the Group. The strategy has been approved by the Board of Directors and we expect our finance and tax teams, and any external advisers, to adhere to its main values and principles. In light of our approach to transparency and openness we invite all interested parties to view its contents.

We understand that tax can be a complicated matter and therefore we take our UK tax responsibilities and obligations seriously.

## APPROACH TO TAX RISK MANAGEMENT AND GOVERNANCE

- We operate robust and efficient systems of risk management, which are consistent with our corporate governance controls in order to contribute to the effective implementation of this policy.
- All risks identified as potentially impeding our commitment to a high standard of tax compliance or negatively impacting upon the company's reputation will be escalated to the appropriate level for review and consideration, including the Chief Operating Officer, the Audit Committee and the Board of Directors where appropriate.

- We undertake regular training and will request external advice where required to ensure we are capable of identifying and managing the ongoing tax risks we face.

## ATTITUDE TOWARDS TAX PLANNING

- We are committed to paying our fair share of tax. This means paying the correct amount of tax required by law. We appreciate paying the right amount of tax has a wider benefit for the communities in which we operate. Therefore, we are committed to enhancing shareholder value, but with due regard to all of our stakeholders.
- All decisions in respect of tax planning relating to significant and complex commercial transactions will be aligned with our business strategy and core values. As such, all decisions are intended to be supported by a genuine and sound commercial rationale.
- The Board has no intention to enter into artificial arrangements to minimise its tax liabilities, but we will seek to structure commercial transactions in the most efficient and legitimate way.

## THE LEVEL OF RISK IN RELATION TO UK TAXATION THAT THE COMPANY IS PREPARED TO ACCEPT

- We intend to approach all business decisions with a conservative and low tax risk approach. However, we will seek to utilise all relevant incentives and tax reliefs as intended by Parliament where these apply to the Group.
- We maintain a risk register and ensure we have a framework of effective controls to continuously identify, assess and manage tax risks. We monitor, report and escalate risks and incidents to our Chief Operations Officer, our Audit Committee and ultimately our Board.

## APPROACH TOWARDS ITS DEALINGS WITH HMRC

- It is our intention to develop a good working relationship with HM Revenue & Customs by co-operating with them in a professional, timely, and open and transparent manner.
- Where uncertainty exists, we will seek the appropriate clearances from HMRC prior to completing a transaction or submitting a tax return.
- Where we disagree with a tax authority's interpretation of the law, full disclosure will be made. Although, any alternative legal interpretation taken, we believe will be consistent with the intentions of Parliament and fully documented.

Berry Gardens is committed to ensuring its tax affairs are kept up to date and is fully compliant with UK tax law. In turn this policy will be regularly reviewed to ensure it remains fit for purpose.

Nicholas Allen  
Chief Executive Officer

31<sup>st</sup> December 2020