

UK TAX STRATEGY

Background

ForFarmers UK Holdings Ltd is the parent company of the ForFarmers UK group of companies (the “UK Group”), the UK sub-group of ForFarmers NV (“ForFarmers”). The UK tax strategy is published to meet the reporting obligations of the UK Group under Paragraph 19(2) Schedule 19 Finance Act 2016 for the financial year ended 31 December 2020 and provide internal and external stakeholders with details of the approach to managing their UK tax affairs. This strategy will be periodically reviewed and updated, as appropriate, by ForFarmers UK Holdings Ltd.

The ForFarmers group tax strategy is available on the global website:

https://www.forfarmersgroup.eu/en/bestanden/ForFarmers_Group/Corporate-Policies/NL/60391-1/ForFarmers_Tax_strategy_2021_Final_June_2021.pdf

ForFarmers believes that paying taxes is an integral part of companies’ responsibility to society at large. ForFarmers accordingly does not use contrived or abnormal tax structures that are intended for tax avoidance, have no commercial substance, or do not meet the spirit of local or international tax law. ForFarmers does not have any companies that are located in countries that are identified as tax havens by the OECD.

This document provides more information about the tax policy, principles, risk management, and tax knowledge of ForFarmers and the UK Group. More information as available in the Annual Report:

https://www.forfarmersgroup.eu/en/bestanden/ForFarmers_Group/Annual-Report-2020-content/58481-1/AR_ForFarmers_NV_2020_UK.pdf

Tax Policy

ForFarmers is conscious of its responsible role and position in society, and this determines its attitude vis a vis its tax policy. ForFarmers has set principles (see below), which in its opinion are in accordance with how a responsible tax payer should act. These principles take into account the interests of various stakeholders, such as customers, shareholders, employees, tax authorities, regulators, and society at large.

ForFarmers aims to pay the correct amount of tax at the right time, on the profits it made and in the countries where the value was generated relating to those profits. ForFarmers considers fulfilling its tax obligations as part of creating long-term value for all stakeholders.

Many governments have updated, or are in the process of updating, transfer-pricing documentation requirements, including country-by-country reporting to the tax authorities. ForFarmers has filed the country-by-country reports for 2016 to 2019 and procedures have been set-up to ensure that ForFarmers complies with the new requirements and supporting documentation required in various countries. ForFarmers closely monitors related developments and will follow up on legislative proposals in this respect as applicable.



Tax principles

ForFarmers and the UK Group commit to:

- Act in accordance with all applicable tax laws at all times and in compliance with international standards (such as OECD Guidelines). ForFarmers aims to take account of the letter as well as the spirit of the tax laws and regulations;
- Be tax compliant and pay taxes when they are due and owed;
- Prepare and file all tax returns in the form specified and within the time required;
- Prepare and retain the documentation required by the tax laws, or which may be needed to answer any questions raised by HM Revenue & Customs (“HMRC”);
- Have an open and transparent communication line to the HMRC;
- Ensure that tax is aligned with the business, and that there are no tax driven structures that are not in line with the business operating model and tax regulations;
- Pay the correct amount of tax according to where value is created within the normal course of commercial activity and apply transfer pricing calculation using the ‘arm’s-length’ principle.

Tax evasion

As stated in the ForFarmers N.V. Annual Report, ForFarmers has a zero tolerance approach to bribery and corruption. In the context of tax this refers to tax evasion and the facilitation of tax evasion. ForFarmers takes its legal responsibilities very seriously, and expects all employees and anyone who works for, or on behalf of, ForFarmers, not to engage in any activity which evades tax or facilitates or may facilitate the evasion of tax by any other person. Any individual who breaches this policy may face disciplinary action, potentially resulting in dismissal for misconduct or gross misconduct. Similarly, we may terminate ForFarmers relationship with other individuals, organisations and other third parties working on ForFarmers behalf if they breach this policy.

More information on this can be found in the ForFarmers Corporate Criminal Offence policy: https://www.forfarmers.co.uk/bestanden/ForFarmers_UK/PDF-files/61363-1/Corporate_Criminal_Offences_Policy.pdf

Whistle-Blower Policy

The ForFarmers’ Code of Conduct comprises guidelines and principles for day-to-day activities. ForFarmers believes that it is vital that these guidelines and principles are upheld and that any suspicion of wrongdoing or the discovery of wrongdoing is reported. ForFarmers encourages stakeholders to make use of the whistle-blower policy in order to raise any concerns they might have about the conduct of others or the way in which the company deals with certain issues which may entail (suspicion of) wrongdoing. This also applies to (potential) issues relating to tax. The normal procedure would be to bring such issues to the attention of their manager. The company can then take appropriate action. The whistle-blower policy provides a procedure for cases in which this is not



possible or desirable. For more information reference is made to this policy which can be found on our website:

https://www.forfarmersgroup.eu/en/bestanden/ForFarmers_Group/PDF/Overig/15227-5/Whistle-blower_policy.pdf

Tax Governance

ForFarmers acknowledges the importance of good internal risk management and control systems, and strives for a high level of risk awareness in the organisation by actively monitoring risk management. This system is entrenched in the organisation, all the way from the Executive Board and the Executive Committee, under supervision of the Supervisory Board, to all operational and financial departments. ForFarmers uses the methodology for the control and management of the different risks, which is based on the model formulated by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

ForFarmers has low risk appetite for risks regarding compliance with legislation and regulations, including taxes. A Tax Control Framework (“TCF”) has been designed in 2018 to control the risks related to corporate income tax, VAT and payroll/employment taxes. For each risk to be mitigated, control measures have been determined and implemented. These are regularly assessed to ensure they are effective and fall within the desired ForFarmers risk appetite. The TCF has been implemented in the Netherlands and the UK. The effectiveness of the tax controls are subject to review by our Internal Audit department.

External auditors verified that the financial statements prepared by the UK Group represent a true and fair view of the financial position of the organization. The UK Tax Manager discussed key transactions as well as any relevant correspondence with HMRC with the external auditors.

ForFarmers’ Managing Board is responsible for establishing the approach to taxation under the supervision of the Audit Committee of the Supervisory Board. The UK Finance Director, being the UK Group Senior Accounting Officer, is responsible for a correct and timely tax filing, supported by the UK Tax Manager. In addition each filing is reviewed centrally by the Group Tax Manager, Group Finance Director and the CFO. ForFarmers does not consider the effective tax rate as a KPI. The achievements of the tax department are assessed on compliance targets and adherence to local tax legislation.

The implementation and execution of this tax strategy is reviewed by Group Tax on an annual basis. Group Tax informs the CFO on a regular basis throughout the year amongst other updates regarding the tax positions. The Audit Committee and Board are informed by the Group Tax Manager frequently regarding the tax position and tax developments which could have a material impact on the financial statements.

Tax knowledge

Employees involved in the various direct and indirect taxes attend seminars and trainings to stay up-to-date on tax law and regulatory changes.



To enable effective commercial decision making, it is essential that all the tax implications of a proposal are clearly understood by the key stakeholders. It is possible that such proposals may have several different tax outcomes. In such cases the UK Tax Manager will provide advice to ensure that proposals are undertaken in a tax efficient manner whilst ensuring ForFarmers continues to comply with tax laws. In case there is insufficient tax expertise within ForFarmers or the legislative impacts are unclear, ForFarmers may seek external advice to support the decision making process.

Relationship with HMRC

The tax principles, detailed above, govern the way the UK Group interacts with HMRC, but specifically the UK Group commits to:

- establish a collaborative professional relationship with HMRC;
- discuss tax planning, strategy, risks and significant transactions in a transparent and timely manner with HMRC;
- respond to queries and information requests in a timely fashion and keep HMRC informed of progress on responses relating to complex matters;
- work with HMRC to resolve issues in real time and before returns are filed if possible, and where disagreements arise resolve issues by agreement where possible; and
- be open and transparent about decision-making, governance and tax planning.

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