

Griffith Foods UK Tax Strategy

Scope

Introduction to Group structure

This document sets out the tax strategy for the Griffith Foods UK group of companies ('Griffith Foods UK') in accordance with Part 2 of Schedule 19 to the Finance Act 2016. Griffith Foods UK is part of the wider Griffith Foods Group Inc. (a United States resident company). Accordingly, this strategy only applies to Griffith Foods UK. In this strategy, references to 'the firm' or 'the Company' are to Griffith Foods UK. The strategy is being published in accordance with paragraph 16(4) of the Schedule.

This strategy applies from the date of publication until it is superseded. References to 'UK Taxation' are to the taxes and duties set out in paragraph 15(1) of the Schedule which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Land Tax. References to 'tax', 'taxes' or 'taxation' are to UK taxation and to all corresponding worldwide taxes and similar duties in respect of which the Company has legal responsibilities.

Aim

Griffith Foods UK is committed to full compliance with all statutory obligations and full disclosure to relevant tax authorities. The group's tax affairs are managed in a way which takes into account the group's wider corporate reputation in line with Griffith Foods UK's overall high standards of governance.

Governance in relation to UK taxation

- Ultimate responsibility for Griffith Foods UK's tax strategy and compliance rests with the Board of Griffith Foods Group Inc.
- Executive management of the Company is delegated by the Board to the President, Europe;
- The Audit Committee's requirement to monitor the integrity of Griffith Foods UK's financial reporting system, internal controls and risk management framework, expressly includes those elements relating to taxation;

- The Chief Financial Officer is the Board member with executive responsibility for tax matters;
- Day-to-day management of Griffith Foods UK's tax affairs is delegated to the Vice President Finance Europe who reports to the CFO;
- The European Finance team is staffed with appropriately qualified individuals;
- The Board ensures that Griffith Foods UK's tax strategy is one of the factors considered in all investments and significant business decisions taken;
- The Chief Financial Officer reports to the Audit Committee and the Board on Griffith Foods UK's tax affairs and risks during the year.

Risk Management

- Griffith Foods UK operates a system of tax risk assessment and controls as a component of the overall internal control framework applicable to the group's financial reporting system;
- Griffith Foods UK 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;
- Processes relating to different taxes are allocated to appropriate process owners, who carry out a review of activities and processes to identify key risks and mitigating controls in place. These key risks are monitored for business and legislative changes which may impact them and changes to processes or controls are made when required;
- Appropriate training is carried out for staff who manage or process matters which have tax implications;
- Advice is sought from external advisers where appropriate.

Attitude towards tax planning and level of risk

Griffith Foods UK manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax.

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

The level of risk which Griffith Foods UK accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the group's tax affairs. At all times Griffith Foods UK seeks to comply fully with its regulatory and other obligations and to act in a way which upholds its reputation as a responsible corporate citizen. In relation to any specific issue or transaction, the Board is ultimately responsible for identifying the risks, including tax risks, which need to be addressed and for determining what actions should be taken to manage those risks, having regard to the materiality of the amounts and obligations in question.

Relationship with HMRC

Griffith Foods UK seeks to have a transparent and constructive relationship with HMRC during communications in respect of developments in Griffith Foods UK's business, current, future and retrospective tax risks, and interpretation of the law in relation to all relevant taxes.

Griffith Foods UK 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, Griffith Foods UK 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.