

# UK & IE FLORA GROUP LTD

## UK Tax Strategy

### Scope

This strategy applies to UK & IE Flora Group Limited (Flora Group). The strategy is being published in accordance with Schedule 19 to the Finance Act 2016 and was approved by the Board of UK & IE Flora Group Ltd.

This strategy applies from the date of approval by the Board until it is superseded and relates to the financial year ending 31 December 2026.

References to 'UK Taxation' are to the taxes and duties set out in paragraph 15(1) of Schedule 19 Finance Act 2016, which includes Corporation Tax, PAYE, NIC, VAT, Customs Duties, Excise Duties and Stamp Duty Land Tax. References to 'tax', 'taxes' or 'taxation' are to UK taxation and corresponding worldwide taxes and similar duties in respect of which the Company has legal responsibilities.

### Aim

Flora Group is committed to full compliance with all statutory obligations and disclosure to relevant tax authorities. The companies tax affairs are managed in line with the group's strong focus on corporate responsibility and high standards of governance.

### Governance in relation to UK taxation

- Ultimate responsibility for Flora Group's tax strategy and compliance rests with the Board of UK & IE Flora Group Ltd.
- Executive management of Flora Group is delegated by the Board to the Managing Director & Chief Financial Officer.
- The Chief Financial Officer is the Board member with executive responsibility for tax matters.
- Day-to-day management of Flora Group's tax affairs is delegated to the appropriate Heads of Department within the business, who report to the Chief Financial Officer.
- The Chief Financial Officer and Head of Group Finance with day-to-day responsibility for tax are appropriately skilled and experienced individuals.
- Advice is sought from external advisers where appropriate.
- The Board ensures that Flora Group's tax strategy is one of the factors considered in significant investments and business decisions taken.
- The Head of Department with day-to-day responsibility for tax will escalate material tax matters to the Chief Financial Officer who will escalate to the Board, if appropriate.

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## Risk Management

- Flora Group operates a system of tax risk assessment and controls as a component of the overall internal governance framework.
- Flora 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.
- 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.
- 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 have responsibility for performing activities that relate to tax processes.

## Attitude towards tax planning and level of risk

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

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

The level of risk which Flora Group accepts in relation to UK taxation is consistent with its overall objective to achieve certainty in the group's tax affairs. At all times Flora Group 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

Flora Group seeks to have a transparent and constructive relationship with HMRC in respect of developments in Flora Group's business, current, future, and retrospective tax positions, and interpretation of the law in relation to all relevant taxes.

Flora 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, Flora Group discloses 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 and rectified as soon as reasonably practicable after they are identified