

# APETITO (UK) HOLDINGS LIMITED

## TAX STRATEGY STATEMENT

### Introduction

Our values are at the heart of everything we do at apetito. We're dedicated to doing business in an ethical and sustainable way; whether that be as leading food supplier to the health, social care and nursery sectors or our approach to financial conduct. Therefore this strategy, approved by the board of apetito (UK) Holdings Ltd, sets out our approach to conducting tax affairs and risks for apetito (UK) Holdings Ltd and its UK subsidiaries ('apetito UK') for the year ending 31<sup>st</sup> December 2023.

The publication of this information is in compliance with our duty under paragraph 16(2) of Schedule 19 of the Finance Act 2016 and will be reviewed annually.

### Approach to risk management and governance arrangements

apetito UK is committed to:

- Following all applicable laws and regulations relating to its tax activities
- Maintaining an open and honest relationship with the tax authorities based on collaboration and integrity
- Ensuring the tax strategy adopted is consistent with the Group's overall strategy and values
- Applying diligence and care in our management of tax risk and ensuring our tax governance is appropriate
- Using incentives and reliefs to minimise the tax cost of conducting our business, while ensuring these reliefs are not used for purposes knowingly contradictory to the intent of the legislation

apetito UK has a low appetite towards tax risk and as such all significant tax decisions are agreed by the Chief Financial Officer, with support from the Head of Finance, and reviewed, monitored and endorsed by the Board.

Our tax strategy aims to bring value to our shareholders, taking advantage of incentives and exemptions where available, however we will not implement aggressive tax planning schemes or artificial tax planning arrangements.

apetito UK has policies, procedures and controls in place that are assessed through a central risk register. These are overseen by the Chief Financial Officer and Head of Finance; while monitored and reviewed by internal teams, apetito AG Internal Audit and external specialists.

**Attitude towards tax planning**

When entering into commercial transactions, apetito UK seeks to take advantage of available tax incentives, reliefs and exemptions, consistent with the spirit as well as the letter of the tax law; taking external advice to confirm this if necessary.

apetito UK's policy is to not enter into any artificial tax planning arrangements that are not underpinned by a commercial transaction.

**The level of risk in relation to UK taxation**

apetito UK seeks to comply fully with its regulatory obligations and ensures the tax arrangements are consistent with a low tax risk approach to conducting its business. Although apetito UK has not been subject to a formal risk assessment by HMRC due to its size, we would anticipate that the business would be considered as 'low risk'.

apetito UK does not seek to structure transactions in ways that give tax results inconsistent with their underlying economic consequences.

Where the tax treatment of any particular material transaction is uncertain, external tax advice will be sought before proceeding with the transaction.

**The approach towards dealings with HMRC**

apetito UK's approach to HMRC is transparent, collaborative and one we seek to maintain to the ethical standards set by our core values. Integrity and consistency are central to the management of taxes, underpinned by our approach to tax risk management. apetito UK aims to comply with both the spirit and letter of the law on all tax matters and would seek to take the initiative to raise with HMRC any doubtful or contentious issues.

apetito UK engages on a real-time basis with HMRC to ensure compliance and create certainty for the business in respect of both direct and indirect taxes



Jonathan Willis