

# Halewood Wines and Spirits Group Tax Strategy

## Introduction

In compliance with Schedule 19 of the Finance Act 2016, this document sets out the policy and approach taken by the Halewood Group in conducting its tax affairs.

The board of directors have approved this policy.

The policy will be reviewed annually by the Group FD and any necessary updates will be presented to the directors.

References in this policy to tax include all forms of direct and indirect tax. This policy applies to Halewood Wine and Spirits plc and all its subsidiaries (“the Group”) and all employees and officers of the group.

This document sets out the group approach to tax management and to act as a reference for members and employees of the group. This strategy is not designed to be an operational manual with detailed instructions on the execution of the processes, these will be maintained and reviewed by respective business areas.

## Objectives

Ensuring the tax strategy of the Group is aligned to the overall business strategy.

Ensuring accurate and on time reporting of all tax matters.

Compliance with all relevant tax legislation in all jurisdictions.

Management of tax risks through an appropriate and adequate control framework

## Tax Governance

The directors of the group have approved the tax strategy.

The Group FD has the overall responsibility for compliance with the policy as the SAO for the group.

On an ongoing basis, the Financial Controllers and the UK Finance Director have the responsibility for taking appropriate actions to comply with the policy at a transactional and practical level.

## Tax Planning

The Group do not engage in aggressive tax planning and will not engage in, condone or support tax avoidance or evasion of any sort, from companies within the group. We will also, as is practicable, encourage our partners to engage in responsible tax practices. As part of ongoing business decisions, the group will engage with specialists in taxation and in specific forms of taxation in order to understand the tax implications of business decisions and will, as is reasonable, look to make the decisions that are most beneficial to the shareholders of the business, provided those decisions are in full compliance with all relevant legislation in force at the time.

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Due to the extent and nature of the group's activities, there is a reliance on external advice in order to achieve full compliance in each of the territories and markets in which the group operates.

| Our Strategic Objectives   | How we achieve them  |
|--|--|
| <p>Maintain an open, honest relationship with tax authorities.</p>   | <p>We are committed to an honest, open and professional relationship with HMRC.</p> <p>We aim to provide access as required to relevant staff at all levels of the organisation.</p> <p>We aim to ensure that we maintain good records and processes.</p> <p>We aim to respond to all questions in a timely manner and with appropriate answers.</p> <p>Where there are matters of a material nature we aim to discuss in advance with the relevant authorities.</p> <p>Where we operate in different jurisdictions, we will engage with relevant tax authorities, either directly or via external advisers, as required. We will adopt the same levels of transparency and diligence that we adopt in the UK.</p> |
| <p>We will monitor our tax risk and ensure effective controls are in place to mitigate this</p>                                      | <p>We will take a risk based approach to our tax planning. Our overall, and tax, risk appetite across the Group will be regularly evaluated.</p>   |
| <p>We will maintain appropriate controls to manage our tax risk across the organisation</p>  | <p>In order to ensure and maintain compliance with all applicable tax legislation, the group has in place controls and procedures appropriate to its size and nature. This includes, but is not limited to, due diligence on suppliers and customers, segregation of duties, regular and ongoing reviews of the changes to relevant legislation, transfer pricing reviews and the provision of outsourced advice where required.</p> <p>The group utilises these processes and reviews them on an ongoing basis in order to minimise the risks that taxes may be incorrectly applied, recorded, reported or paid.</p>  |
| <p>We will ensure that our governance arrangements and organisational structures are adequate to manage our tax risk effectively</p> | <p>All finance personnel are responsible for Complying with this policy and with relevant tax regulations.</p> <p>We will also communicate the tax strategy to all affected staff, for example, HR, Operations, Sales, to ensure that they are aware of the requirements and can highlight any relevant issues as they arise.</p> <p>Appropriate training will be provided all relevant staff as required.</p>   |