



## Oetker-Group UK Tax Strategy

### 1 Preamble

The Oetker-Group (Dr. August Oetker KG and its affiliates) is a German business group oriented towards sustainability and compliance. The good reputation of the company, brands and products are one of the most appreciated goods among customers, business partners and the public. The Oetker-Group's reputation is determined to a large extent by its professional behavior in business life. Minor violations of rights can damage the group's good reputation and can also cause a major financial loss.

This page sets out the strategic tax objectives for the Oetker-Group. This strategy applies to all UK entities and from the date of publication until it is superseded. It sets out the group's general tax arrangements as well as the policy and approach to tax risk management, attitude to tax planning and working with HMRC.

### 2 Governance

It is essential that the Oetker-Group is compliant with laws and regulations, notably regarding tax laws. The Group Companies (in the following „the companies“) of the Oetker-Group fulfill their duties at any time. Violations of laws and regulations do not only harm the group's reputation, they could also have legal consequences for the business group and its management. For this reason, the Oetker-Group established a code for professional behavior in business life, the “Code of Conduct”, of 10 February 2011.

Additionally the Tax Guideline of 1 November 2017 shall substantiate the above-mentioned Code of Conduct for fiscal purposes and helps to differentiate the areas of responsibility of the Group's respective management. The Tax Guideline is enacted by group management's decision and has to be proclaimed and implemented through the companies' respective management in each business area.

The Code of Conduct and the Tax Guideline set out what is expected of everyone at the Oetker-Group and the UK tax strategy aligns with this.

### 3 Tax Planning

The tax planning supports our business and reflects commercial and economic activity. There are no artificial tax arrangements. Aggressive tax planning is

not proactively considered and external advice is sought where appropriate. The Oetker-Group encourages ethical and transparent business practices and does not employ legal entities for purposes of tax avoidance.

Sometimes governments implement tax incentives or exemptions in order to support investment, employment and economic development. The Oetker-Group seeks to apply them in the manner intended where they exist and reflect commercial and economic activity.

Transactions between the companies are on an arm's-length basis and in accordance with the OECD principles. This approach is consistent taking in all countries that the Oetker-Group operates in and ensuring appropriate remuneration where the value is created.

### 4 Tax Risk Management

The respective management is solely responsible for the tax issues of the companies and fulfillment of their tax obligations. They can delegate their responsibility to qualified employees who are responsible for tax matters. Notwithstanding the delegation, the responsibility remains with the management.

In order to perform their duties, to ensure fulfillment and to limit tax risks, companies have to implement organizational structures according to the requirements of their respective national legislation (internal control system). The management has to monitor tax compliance through appropriate organizational provisions. Each company is responsible to identifying, evaluating and analyzing their tax risks, notably for inherent tax risks of operational business processes.

### 5 Relationship with governments

In this context, it is essential to cooperate fully and transparently with the relevant fiscal authority. It is the Oetker-Groups general policy to be transparent and proactive in all interactions with the HMRC.

In regard to the latter, the Oetker-Group has a pioneer role in Germany. For many years the Group has been part of a pilot project in collaboration with the German Fiscal Authority which guarantees a prompt audit. This continuous cooperation with the fiscal authorities ensures full transparency as required.