



HARIBO UK Tax Strategy – for the accounting period ended 31 December 2022

Scope

Dunhills (Pontefract) Plc (trading as HARIBO UK), a public limited company registered in England and Wales, is wholly owned by HARIBO International GmbH, a company incorporated in Germany.

This strategy applies to Dunhills (Pontefract) Plc ("the company") in accordance with paragraph 19(4) of Schedule 19 to the Finance Act 2016.

This strategy applies from the date of publication until it is superseded.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

Dunhills (Pontefract) Plc is committed to full compliance with all statutory obligations and full disclosure to relevant tax authorities. The company's tax affairs are managed in a way which takes into account the company's wider corporate reputation in line with Dunhills (Pontefract) Plc's overall high standards of governance.

Governance in relation to UK taxation

- Ultimate responsibility for Dunhills (Pontefract) Plc's tax strategy and compliance rests with the Board of Dunhills (Pontefract) Plc;
- The Chief Financial Officer ('CFO') is the Board member with executive responsibility for tax matters;
- Day-to-day management of Dunhills (Pontefract) Plc's tax affairs is delegated to the Financial Controller, who reports to the CFO;
- The Board ensures that Dunhills (Pontefract) Plc's tax strategy is one of the factors considered in all investments and significant business decisions taken.

Risk Management

- Dunhills (Pontefract) Plc operates a system of tax risk assessment and controls as a component of the overall internal control framework applicable to the company's financial reporting system;
- Dunhills (Pontefract) Plc 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;
- Advice is sought from external advisers where appropriate.

Attitude towards tax planning and level of risk

Dunhills (Pontefract) Plc 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, Dunhills (Pontefract) Plc seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation. Dunhills (Pontefract) Plc does not undertake tax planning unrelated to such commercial transactions.

The level of risk which Dunhills (Pontefract) Plc accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the company's tax affairs. At all times Dunhills (Pontefract) Plc 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

Dunhills (Pontefract) Plc seeks to have a transparent and constructive relationship with HMRC. When submitting tax computations and returns to HMRC, Dunhills (Pontefract) Plc 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.

Signed:



Date: 31/01/2023

On behalf of the Board of Directors

Chief Financial Officer

Dunhills (Pontefract) Plc