

UK Tax Strategy

Euro Food Brands works in partnership with premium food & drink producers across the world, and with retailers large & small, to bring the finest food brands to the UK and Ireland.

The Euro Food Brands group consists of the following active UK entities and are collectively referred to as “the Group” for the purposes of this tax strategy document:

- E.F.B. Holdings Limited
- E.F.B. Group Holdings Limited
- E.F.B. Group Limited
- Euro Food Brands Limited
- Yogiyo Limited

The Group is publishing this tax governance statement with regards to its approach to:

1. Managing UK tax risks
2. Attitude towards tax planning
3. The level of risk it is prepared to accept for UK taxation
4. How it works with HMRC

The Group regards this publication as complying with their duty under Paragraph 16(2) of Schedule 19 of the Finance Act 2016, the duty to publish a tax strategy, in the current financial year, being the year ending 30 September 2026.

1. Risk Management, Governance and Compliance with UK Tax Laws

The Group completes both direct and indirect tax returns and manages these by a series of internal and external checks. The Group engages with reputable external advisors who are appointed to assist the Group in meeting its tax obligations where applicable.

The UK Group is committed to acting with integrity and transparency with clearly defined lines of responsibility for its tax affairs ensuring decisions are taken at an appropriate level. All tax filings are overseen by the Chief Operating Officer and SAO.

The objective of the UK Group is to be low tax risk by aiming to:

- submit its UK tax returns on a timely basis and pay its tax liabilities by their due dates, through thorough internal and external reviews, as well as robust systems and controls;
- routinely assess its systems and controls, collaborating with reputable independent advisors to keep pace with changes in tax legislation and effectively manage key tax risks;
- disclose relevant details, should there be material uncertainty regarding the tax treatment of a particular transaction, in such a way that is transparent and includes sufficient detail to enable HM Revenue & Customs (“HMRC”) to consider the matter, and

- ensure that the Chief Operating Officer and SAO, and the supporting team, hold relevant qualifications, has appropriate experience and are adequately trained.

2. Our Attitude to Tax Planning

The Group seeks to implement any transactions in a tax efficient way, utilising the tax reliefs and allowances in the manner only as intended by Parliament. The Group does not undertake any artificial transactions with the sole purpose of reducing UK tax liabilities.

In cases where the tax guidance is unclear or the Group does not feel it has the necessary expert knowledge to assess the tax consequences adequately, external advice may be sought to support the Group's decision-making process.

3. Acceptable level of risk

The Group understands its role in ensuring the right level of tax is paid in the jurisdiction in which value is created. As with all UK companies or UK groups, there is inevitably an exposure to some tax risk and uncertainty. The Group recognises this and attempts to mitigate risks and uncertainty where possible through clear policies, procedures and internal controls.

The Group describes itself as risk adverse regarding taxation matters and takes a low-risk approach when considering significant transactions. The Group has no interest in artificial transactions, such as those which seek to shift profits away from the jurisdiction in which the economic activity takes place to one with a lower tax rate.

As a privately owned business, the Group does not suffer from any undue pressures or influence from external stakeholders.

4. Our Approach towards Dealings with HMRC

The Group does not have a specific contact at HMRC but acts in a pro-active, open and transparent manner, as far as reasonably possible, by complying with all the disclosure obligations required of it by HMRC.

The Group is attentive to HMRC's interpretation of the law and its guidance. It will seek to resolve any areas of uncertainty by engaging with HMRC, carefully considering legislation and case law, and consulting external advisors as appropriate. The Group will consider seeking any available pre-transaction clearances from HMRC.

If a dispute on any tax matter were to arise the Group will aim to promptly resolve the matter with the agreement of HMRC.