

G's GROUP HOLDINGS LTD

(& SUBSIDIARIES): TAX STRATEGY

OUR BUSINESS TAX ARRANGEMENTS

This document sets out the tax strategy of G's Group Holdings Limited (& subsidiaries) and the approach to conducting tax affairs in the UK. This strategy applies to the list of entities set out below and is effective from the date of publication until it is superseded.

G's Group Holdings Limited regards the publication of this tax strategy as complying with the duty under paragraph 16(2) Schedule 19 Finance Act 2016 to publish a tax strategy. This strategy was first published on 30 April 2018 and has been reviewed and confirmed that it remains our published tax strategy.

We comply with tax law and practice in all of the territories in which we operate and we ensure prompt payment of taxes due. Compliance for us means paying the right amount of tax in the right place at the right time, ensuring all our tax filing and reporting obligations are prepared in conformity with the appropriate domestic laws and regulations, reporting requirements and generally accepted standards, and involves disclosing all relevant facts and circumstances to the tax authorities and claiming reliefs and incentives where available.

THIS STATEMENT WAS FIRST APPROVED BY THE AUDIT COMMITTEE OF G's GROUP HOLDINGS LIMITED ON 28 MARCH 2018. IT HAS BEEN REVIEWED AS AT 30 APRIL 2023 AND CONFIRMED AS NOT REQUIRING SPECIFIC UPDATES AT THIS TIME. IT WILL CONTINUE TO BE REVIEWED ANNUALLY AND UPDATED AS REQUIRED.

GOVERNANCE: HOW G's GROUP HOLDINGS MANAGES ITS TAX RISKS

Tax risk is one of the commercial risks that the group is exposed to. Tax risk is the risk that our tax reporting returns or liabilities are inaccurate or incomplete, potentially leading to under or over collection or payment of tax, exposing us to tax authority sanctions as well as potential damage to our reputation. We are subject to the following principal taxes:

- corporation tax on the profits of our business;
- employer social security contributions on employment costs; and
- value added tax (or its equivalent) on relevant goods and services.

We also facilitate the withholding and payment of income tax and social security contributions from employee remuneration.

We carefully manage the tax risks and costs inherent in every commercial transaction, in the same way as any other cost. Therefore, tax will follow the commercial outcomes, taking account of the need for tax efficiency and our understanding of the currently applicable laws and practice.

WE MANAGE TAX RISK WITHIN OUR RISK MANAGEMENT AND GOVERNANCE FRAMEWORK:

- our Board is accountable for risk management, in conjunction with the Audit Committee, and ensures that an effective Risk Management Framework is in place, which encompasses tax risk;
- tax strategy and our tax function is part of the finance function and the responsibility of our Chief Financial Officer, who is also our Senior Accounting Officer.

OUR ATTITUDE TO TAX RISK AND TAX PLANNING

Our appetite for tax risk is low. Our business model and operating structure are straightforward and not subject to significant judgment in the application of tax law. We are committed to complying with all applicable tax laws and regulations in the countries in which we operate as well as international standards, such as the OECD transfer pricing guidelines. We believe in safeguarding our reputation and our relationships with customers, shareholders and tax authorities alike.

We do not enter into artificial arrangements in order to avoid taxation or to defeat the stated purpose of the legislation.

While we will run our business in a cost effective manner in line with our obligations to all our stakeholders, in terms of tax we will only utilise legitimate tax reliefs for the purposes for which they were intended. We do not:

- engage in aggressive tax planning;
- seek to structure transactions in an artificial manner whereby results are inconsistent with the underlying economic consequences; or
- promote tax avoidance or condone abusive tax practices which would contravene our ethics and culture or the law.

Where there is uncertainty surrounding the interpretation of tax laws, we will seek second opinions from external tax advisors, having established our own understanding of the position, and/or seek to resolve the uncertainty by dialogue with tax authorities.

WORKING WITH HMRC

We maintain a transparent, professional and constructive working relationship with HMRC in the UK. This includes, where appropriate, regular, open dialogue on significant tax issues and developments in our business. We value the fact that, as an HMRC defined "large business", we have a direct Customer Compliance Manager with whom we can proactively engage in dialogue to resolve issues, obtain clarity on aspects of uncertainty and provide early notification of business developments likely to have tax consequences.

LIST OF ENTITIES COVERED BY THIS TAX STRATEGY:

G's GROUP HOLDINGS LIMITED

G's FRESH LIMITED

G's FRESH BEETROOT LIMITED

G's FRESH MUSHROOMS LIMITED

BARWAY SERVICES LIMITED

