Tax Strategy

Scope

This tax strategy applies to the following UK companies (together referred to in this document as "the Companies"):

Global Pacific Processors UK Limited
Global Growers Limited
Global Pacific UK Limited
Verri Berri Limited

Each company adopts this strategy for the financial year ending December 2025 in accordance with Schedule 19 of the Finance Act 2016. The strategy sets out the Companies' approach to tax governance, risk management, tax planning, risk appetite and engagement with HMRC.

Governance & Risk Management

The Companies recognise that strong governance and effective risk management are essential to long-term sustainability and stakeholder trust. Tax matters are managed within this wider framework of accountability and oversight.

- Tax oversight is exercised by each company's Board of Directors, with support from the shared Senior Accounting Officer and Finance Director.
- Tax risks are identified, assessed, and managed within each company's broader risk framework.
- Internal controls and reporting processes ensure compliance with statutory obligations.
- External advisors are engaged where specialist technical input is required.
- The Board reviews the tax strategy annually as part of its governance cycle.

Although published in a single document, each company is responsible for applying these principles to its own operations.

Tax Planning Approach

The Companies' approach to tax planning reflects a commitment to responsible business conduct and fair dealing between stakeholders.

- The Companies do not engage in artificial tax arrangements.
- All tax positions are commercially grounded, technically supported and consistent with both the letter and spirit of UK tax law.
- Intercompany transactions (where relevant) are priced in line with OECD guidelines and reflect the genuine flow of goods and services across the supply chain.

Risk Appetite

The Companies have a low tolerance for tax risk. Tax positions are based on clear technical support and appropriate professional advice. Where uncertainty arises, the Companies seek clarification to ensure outcomes remain consistent with their low-risk approach.

Relationship with HMRC

The Companies are committed to maintaining a transparent and constructive relationship with HMRC. Engagement is conducted in a professional and respectful manner, with timely filing, disclosure and payment of all taxes due. Where material issues arise, the Companies work collaboratively with HMRC to achieve clarity and certainty.

Publication

This strategy is published on the Companies' website in accordance with statutory requirements and will remain in effect until updated or replaced.