



Vitacress Tax Strategy and Approach – United Kingdom

Vitacress is the one of Europe's leading suppliers of fresh produce, specialising in watercress, salads and fresh herbs.

This published document applies to the Vitacress Group of companies ("Vitacress" or "Group") and satisfies paragraph 19(2), Schedule 19 of the UK Finance Act 2016 in respect of our financial year ending 31 December 2019. Vitacress qualifies through its membership of a Multi-National Enterprise Group, RAR - Sociedade de Controle (Holding), S.A. ("RAR Group").

The Group has a tax policy, procedures, systems and controls in place to ensure compliance with the rules and regulations in the jurisdictions in which Vitacress operates and to reduce tax risk where possible.

This document is published on behalf of Vitacress Limited and its UK subsidiaries (together Vitacress) setting out the business tax strategy and approach for the United Kingdom.

This tax strategy has been approved by the Board of Directors of Vitacress and will be reviewed and approved annually.

Governance

Vitacress maintains internal policies, procedures, systems and controls to ensure compliance with the rules and regulations in the jurisdictions in which the Group operates and provides training to its personnel to help manage tax risk.

The Board of Directors are ultimately responsible for Vitacress' overall tax, whilst the Group Finance Director is the Board member with the executive responsibility for managing the tax matters. Overall management of tax risk is performed in conjunction with the Head of Tax at RAR Group. The Group Finance Team, who manage the day to day activities, are appropriately qualified individuals who are provided with regular training. The Group Finance Director and Finance Team utilise the experience of external advisors on specialist matters where necessary.

Tax Planning

Vitacress complies with all tax rules and regulations in all the jurisdictions it operates in and conducts tax transactions only in as far as to claim allowable reliefs, exemptions and incentives in the businesses to which it operates, whilst following both the letter and spirit of the laws in place. It does not take part in arrangements that lack commercial purpose or could be considered aggressive tax planning schemes.

Tax Risk

The Board sees compliance with tax legislation in the territories in which we operate as key to managing our tax risk. We recognise the importance of tax in the wider context of business decisions and have processes in place to ensure tax is considered as part of our decision making process.

The Group monitor for changes in tax legislation that could impact the Group's operations and will consult with external advisors regularly to ensure that we continue to maintain compliance through all our economic activities. The individual business units are responsible for compliance with local tax in the territories in which they operate and completing statutory filings as necessary, using local, in-country tax advisors where appropriate.

Relationship with Her Majesty's Revenue & Customs (HMRC)

Vitacress is committed to the principles of openness and transparency with tax authorities. Any matters would be dealt with professionally and with an aim to respond to any queries quickly, efficiently and in positive collaboration with the tax authorities, governments or related third parties. We are committed to robust tax administration that includes appropriate timely tax filings and payment of taxes.

We employ the services of professional tax advisers to act as our agents. This is seen by the Board as a way to further reduce the tax risk.

June 2019