

WILLIAM JACKSON FOODS LIMITED

TAX STRATEGY

YEAR ENDED 25 APRIL 2020

This document establishes the tax strategy of William Jackson Foods Limited (WJF) and its subsidiary companies. The purpose of the tax strategy is to guide all employees and specifically those with a responsibility for tax within the Group, and to set out the tax framework and objectives aligned with the Group's core values.

In publishing this document, the Group is complying with the duty under paragraph 16(2), Schedule 19 of Finance Act 2016. This document is effective from the year ending 25 April 2020 and will continue to be reviewed periodically thereafter.

Tax Strategy

The strategy of WJF with regards to corporation tax, indirect tax, VAT, stamp duty and capital gains tax can be summarised as follows:

Approach to managing tax risks

It is WJF's main focus to have efficient and effective compliance and reporting processes for all taxes, by producing well managed and accurate tax numbers reflected within group reporting, statutory accounts and the relevant tax returns. Tax compliance, accurate and transparent reporting and timely tax payments provides the foundation for good tax risk management and therefore is fundamental to the Tax Strategy of the Group.

The overall accountability for tax compliance resides with the Chief Financial Officer of the Group, who is also the Group's appointed SAO. Day to day accountability for business taxes resides with the Company Secretary, and for employment taxes with the Group People Director. Each operating company Finance Director and People Director is responsible for providing accurate and timely information to the Group in order for this to be achieved.

Our tax compliance will be timely and accurate and where appropriate will include sufficient detail to enable the tax authorities to form an accurate view of the affairs of the company in question. Diligent professional care and judgment will be taken to arrive at well-reasoned conclusions, supported by documentation and written advice where appropriate.

Approach to tax planning

The over-riding principle is to manage tax risk and ensure that WJF conducts its tax activities in accordance with the Group's core values and in line with the Group's corporate governance framework which is used to develop a culture of honesty, integrity and accountability. Assessment of risk must take due account of both short and long term considerations and risks, as well as the impact on corporate reputation/brand.

The Group does not participate in any tax planning arrangements that do not comply with the legal interpretation. Where legislation is unclear we seek advice from HMRC and our external tax advisers. Where available, the Group looks to make use of government sponsored incentives and reliefs to reduce its tax cost. The commercial needs of the Group are paramount and any tax planning will be undertaken in this context and subject to the approval process outlined in the Group's tax policy.

Tax risk management

All tax optimisation opportunities will be rigorously evaluated by the Group and may be considered if they fall within an acceptably low level of risk.

WJF will review all tax risks on a quarterly basis in conjunction with its professional advisers to ensure all risks and opportunities are identified and monitored.

HMRC relationship

WJF are committed to adopting an honest and open approach with the relevant tax authorities and to maintain a relationship of the highest standard. The Group will foster a strong relationship and clear communication lines between the Group, our external advisers and HMRC, in particular the CCM led by the Group's appointed SAO.

Approved by the Board

April 2020