



## **Introduction**

Northumbrian Fine Foods' ("NFF") UK is the leading specialist supplier of own-label gluten-free biscuits and cookies in the United Kingdom market. Located in Gateshead, our production facility operates three lines, with an annual output exceeding 4,300 tonnes annually in plain, chocolate and sandwich biscuit formats.

NFF is part of the Biscuit International Group ("BI") the leading private label biscuits and bread substituted manufacturer in Europe.

## **Tax Strategy**

NFF UK tax strategy is to comply in full, with UK tax law for large groups for the requirement to publish their UK tax strategy regarding their UK entities and in accordance with the requirements of Schedule 19 under the Finance Act 2016.

This tax strategy is in relation to and effective for the financial year ended 31 December 2023 and will be reviewed and approved by the Board of NFF on an annual basis and amended accordingly each subsequent year.

## **Risk Management**

As with all businesses, NFF are subject to risk in our normal course of business, which in turn can impact our financial results, for example supply chain disruption, change in product demand, price increases, economic conditions to name a few.

The objective of NFF's risk management is to properly identify, measure and manage risk so that they are aligned with both NFF's strategy and risk appetite. The risk managed through good management and robust internal controls aimed at monitoring and identifying changes needed if required.

NFF aim to ensure all staff are adequately trained for the correct job role which are documented. Where there are areas of uncertainty, the internal Group Tax Director is consulted and / or external appropriate advisors are sourced and engaged to provide specialist advice and necessary training.

## **UK Taxation Governance**

The tax strategy ultimately rests with the Board of NFF ensuring that this is of high priority when making significant future business decisions.

The Managing Director, along with the UK Head of Finance and the Finance team, are responsible for the management of the UK tax affairs with any potential material matters being brought to the attention of the Board at the earliest opportunity.

NFF continually review internal controls along with ensuring that we have an adequate risk management framework with support from the Group Tax Director and access to

external advisors for advice and assistance in the monitoring of the impact of any possible tax matters, where needed.

The Group Tax Director is responsible for the Group tax function and for the Group tax risk management function. The Group Tax Director reports directly to the Group CFO, a member of the Executive Board of the BI Group.

### **Tax planning**

The overall objective of NFF is to comply with UK tax law, meaning we aim to ensure that we are paying the correct amount of tax by the required date, claiming reliefs and incentives where applicable and engage with external tax advisers to ensure that UK tax obligations are fully complied with.

In the past, Brexit and Covid impacted our tax planning as this was a constantly challenging and changing environment, resulting in many areas being reassessed. This is reviewed on an ongoing basis.

Where NFF enter into intra-group transactions, these are subject to the BI TP Policy to ensure an arm's length basis with adherence to the relevant guidance that has been issued under the respective tax jurisdiction.

### **Level of Risk acceptable for UK taxation**

Sufficient tax risk management and governance processes are in place as the business has a low tolerance towards tax risk. We are committed to comply with UK tax obligations and where necessary, will seek advice to ensure that any tax arrangements adhere to our low risk assessment, both financially and on a reputational basis.

### **Relationship with HMRC**

NFF aim to always be open and transparent with HMRC, ensuring all dealings will be carried out (business or transactional) in a timely and reasonable manner.

NFF commit to:

- Submit all year-end tax computations within the filing deadlines and upon any errors being identified in previous submissions, we look to fully disclose these at the earliest opportunity following their identification.
- Pay all taxes when they fall due in respect of Corporation tax, PAYE, VAT – contributing in excess of £2M annually to HMRC across the different taxes.

This tax strategy was published on 24/11/2023 and agreed by the board on 07/12/2023 and will be reviewed on an annual basis from this date.