



FRESCA GROUP LIMITED TAX STRATEGY

This document, approved by the Board of Fresca Group Limited, sets out the policy and approach to managing UK tax compliance and the UK tax risks of Fresca Group Limited and our subsidiaries. This Tax Strategy has been prepared in accordance with Schedule 19 of the Finance Act 2016 and relates to our April 2020 financial year.

The Group's approach to UK taxation risk management and governance arrangements.

Our approach to risk management and governance arrangements in relation to UK taxation is consistent with our intent to be a good corporate citizen. We believe we must contribute fairly, through the tax system, to the cost of providing a secure and robust business environment. It is not our intention to pursue a tax strategy which could bring into question the Group's reputation or damage the value of the Group.

Decisions over tax management and risks are the responsibility of the Board and particularly the Group Finance Director who is also our Senior Accounting Officer. The Group Finance Director monitors tax compliance through various business process controls including an annual SAO review process.

Staff making key tax decisions are appropriately experienced and qualified. Staff attend training or seek further information, as required, to ensure they are suitably informed with regards to tax requirements. Equally we seek certainty with regards tax risks and will consult with external specialists to ensure tax matters are fully considered.

Fresca Group's activities present a low risk tax operating environment and our tax matters are well understood. Our main UK tax risks arise from unusual or large transactions which are infrequent and at such times advice is sought from external specialists. Our tax strategy provides a framework within which the business operates when making tax related decisions.

The Group's attitude towards tax planning

We seek to ensure compliance with the intent of relevant tax legislation and pay appropriate tax, on a timely basis and in the correct locations. We aim to be fully compliant with tax laws and regulations and as such are not involved in tax planning other than that which supports genuine commercial activity.

The level of UK taxation risk the Group is prepared to accept

We have a low threshold to tax risk. We believe this prudent behaviour helps to secure long term sustainability for our various businesses. In this regard we work closely with the UK tax authorities and have achieved low risk status as defined by HMRC. HMRC judges the tax risk of a business according to inherent (complexity, boundary and change), behavioural (governance, delivery and tax strategy) and contribution risk factors. Across all risk factors the Group has secured a low risk rating and the Board wishes to maintain this.

The Group's approach in its dealings with HMRC

We actively seek to develop and maintain constructive relationships with HMRC. We engage in an open and clear manner and seek early dialogue to discuss unusual business events and transactions. The Group is open with HMRC about managing tax compliance across all relevant taxes and duties and raises material compliance issues and uncertainties with HMRC in real time. There is a low level of business change affecting tax obligations and the Group has appropriate tax accounting arrangements in place.

For and on behalf of the Fresca Group Board
30/07/2019