

St Austell Brewery Company Limited

Tax strategy for the year ending 30 December 2023

Main Principles

This Tax Strategy, approved by the Board and sets out the organisation's approach to managing its tax affairs. This document has been prepared on behalf of St Austell Brewery Company Limited and its subsidiaries (collectively, the 'Group').

Introduction

St Austell Brewery Company Limited is a UK incorporated company that operates pubs, inns and hotels both directly under management or via tenanted and lease arrangement. We also brew and package our own beer and wholesale alcoholic and non-alcoholic drinks including our own and third-party products.

The Group's direct contribution to taxation in the UK covers corporation tax, employment taxes, stamp duty, customs & excise duties, business rates, council tax and VAT. The Group recognises that collecting and paying taxes is an important way in which our business contributes to society. The Group's Tax Strategy is focussed on maintaining strong tax administration practices, the key components of which include:

- ensuring that we pay the right amount of tax at the right time supported by timely and accurate submission of tax returns;
- delivering an effective tax risk management process, which reduces risk;
- arranging our tax affairs in an efficient manner; and
- developing and maintaining a positive as well as collaborative relationship with HMRC.

Governance

The directors of the Group are aware of the importance of managing the Group's tax affairs. The directors take overall responsibility for the tax affairs of the Group and delegate compliance tasks to employees and professional advisers with the appropriate experience of such matters. The directors aim to ensure full compliance with tax obligations in a transparent manner.

The Board member with executive responsibility for tax matters is the Chief Financial Officer (CFO) The Head of Financial Services, who reports into the CFO, takes day-to-day responsibility for the management of tax matters and is supported by the Finance and payroll teams in managing the group's tax obligations. In carrying out these duties, the Head of Financial Services consults regularly with the company's tax advisers, EY LLP ensuring compliance with emerging and complex issues as well as review of all returns and computations. The Audit & Risk Committee monitors the appropriateness and integrity of the tax strategy.

Attitude to tax planning and risk

Compliance with UK tax law is a key priority of the Group and therefore the Group ensures that it allocates sufficient resource to support compliance and mitigate the level of tax risk as far as possible. The Group adopts a conservative approach to tax planning within the context of its duty to

its shareholders to manage business expenses, which includes taxation. The Group is solely UK based and does not use tax havens or complicated group structures.

The Group will only be involved in tax mitigation strategies to the extent that the strategy adopted is in line with and supports organisation's commercial objectives and activities. In doing so, the Group seeks to claim all relevant tax reliefs made available by the UK Government in line with the published policy objectives of such reliefs.

UK tax law can be complex and the size of the Group is such that not all expertise is available within the in-house tax function. In order to ensure that we maintain strong tax administration that includes accurate and timely filing of tax returns and payment of taxes internal resources are supplemented by the services of leading accountants and tax advisors. If and where uncertainty over the interpretation and application of tax law arises, these advisors are consulted to minimise uncertainty and risk to the Group.

Due to the increasingly complex nature of UK tax legislation and business operation the Group is in regular contact with its advisors to ensure appropriate tax compliance.

Working with HMRC

The Group aims to meet its compliance obligations in a timely, open and collaborative manner by making accurate returns and providing adequate disclosure on returns and in relation to specific transactions. Where relevant the Group would ensure that it interacts with HMRC through its advisors regarding the impact of new legislation and consideration of HMRC guidance. For example, if the Group became aware of an issue impacting its tax returns, it would seek appropriate advice and ensure that HMRC was informed as soon as practicable. The company is committed to full compliance with all statutory obligations and full disclosure to tax authorities.

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