

Coryton Advanced Fuels Ltd. UK Tax Strategy

Scope and context

Coryton Advanced Fuels Ltd. ('Coryton') is part of the Lantmännen Group, one of Northern Europe's leaders in agriculture machinery, bioenergy and food products. Coryton's Tax Strategy is part of the global Lantmännen Tax Policy, which applies to all tax professionals at the Lantmännen Group and to all other employees who work in the group companies in which Lantmännen Group owns or controls more than 50% of shares or votes

The UK tax strategy publication requirements are set out in Para 19 (2), Schedule 19, Finance Act 2016. In particular, the tax strategy of the business needs to cover four specific requirements:

- how the business manages UK tax risks,
- the business' attitude to tax planning,
- the level of risk the business is prepared to accept for UK taxation,
- the approach of the group towards its dealing with HMRC.

Coryton considers that the above items are all satisfactorily addressed in the document and that the business is therefore compliant with the requirements of the Finance Act 2016 in respect of the financial year ending 31 December 2023.

Background

As a food and agricultural Group, Lantmännen has a strong commitment to its customers, consumers and the outside world. Lantmännen's brand promise is: "Together we take responsibility from field to fork" a promise that applies to full extent in relation to tax matters.

Lantmännen follows international conventions for corporate responsibility. Our Code of Conduct has been drawn up in accordance with the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises. It sets out high standards of behaviour that we expect all our employees to follow. In relation to tax matters in particular, our Code of Conduct stipulates the following principles:

- In the countries where we operate, the individual country's tax laws and regulations shall be followed in the letter and spirit.
- We do not conduct artificial transactions for tax purposes.

UK tax strategy

Lantmännen business strategy of being a sustainable business and taking responsibility from field to fork is strongly supported by the Group's owners. The tax strategy, which is fully aligned with the business strategy, rests on the same fundamental values of sustainability, transparency and responsibility.

Compliance with tax regulations in the countries where Lantmännen operates is a key priority for all tax professionals employed by the Lantmännen Group, including Coryton. The objective is to pay the correct amount of tax at the right time. The profits of the Group entities are taxed in the countries, where Lantmännen operates and has substance. There is a direct link between profit generation and taxation.

Lantmännen Tax Policy, as well as UK Tax Strategy, is comprised of the following, in respect of the approach to tax matters:

1. Compliance

Lantmännen and its employees are obliged at all times to act in accordance with the applicable laws and other regulations and compliance standards of the countries where they operate.

2. Tax structures

All tax structures and financial flows should arise only from commercial purpose and business-driven needs.

3. Transparency

Coryton should always have a transparent approach to tax matters.

Tax function responsibilities & organization

Taxation at Lantmännen is partially the responsibility of its Group Tax Function and partially the responsibility of each of the Lantmännen Business Areas, meaning that the relevant Business Area needs to appoint employees at the local subsidiaries to deal with the various tax matters, which fall outside of the scope for the Group Tax responsibilities. Details of the roles and responsibilities are discussed and agreed with the relevant Business Area as part of the Business Partnering Process.

Lantmännen Group Tax has an integral role in the development, implementation and monitoring of the Group Tax Strategy. The long-term objectives for the Group Tax Function are decided by the overall long-term business strategy and the core values of Lantmännen. The short-term objectives for the Group Tax function are agreed annually with the Group CFO. These are aligned specifically with the Global Finance Function objectives and the overall objectives of Lantmännen.

Effective information sharing and collaboration is essential to achieving the goals and objectives of the Group Tax.

Potential tax risks and risk control

Lantmännen operates in multiple jurisdictions that are governed by both multilateral and bilateral tax agreements and regulations as well as country-specific tax legislation. For Lantmännen, tax exposures and tax risks typically arise in cross-border situations, but tax risks can arise for numerous other reasons e.g., classification and accounting issues. Group Tax at Lantmännen has realised governance and control framework with clear processes for identifying and mitigation of tax risks. Focus for this work is proactive engagement with the business, but there are also control programs and processes in place to monitor the business from a tax perspective. Lantmännen Group Tax handles most of the activities in-house, but in specific local compliance situations, external advisors are used.

Lantmännen's collaboration with the tax authorities

Lantmännen values a good professional and transparent relationship with the tax authorities. A productive and open relationship with the tax authorities, including HM Revenue & Customs, is important to us to ensure that our tax policies and strategy live up to the high standards set out in our Code of Conduct. One of the integral procedures in maintaining transparent relationships with the competent authorities, which the Lantmännen Group applies, is to make reasonable, accurate and appropriate disclosures in correspondence and tax returns.

Approved on 2023-11-14 by Director Group Tax at Lantmännen

Signature



Alexei Drozdov, Director Group Tax