

UK Tax Strategy

This document is published in accordance with the requirements of FA 2016 Sch 19 para 16 in respect of and applying to Icepage Limited and all UK entities in its UK group (Floranova UK), specifically, Floranova Limited, Floranova Vegetable Seed Limited. All of the UK companies are wholly owned.

This strategy is approved, owned and overseen by the Board of Directors of each of the three UK entities.

As a responsible corporate taxpayer, Floranova UK is fully committed to complying with all tax laws and regulations as applicable to our business, ensuring that we pay a fair share of tax in the right place at the right time and claim reliefs and incentives where available. We discuss issues with the tax authorities where relevant.

In structuring our commercial activities we will consider, amongst other factors, the tax laws of the countries within which we operate, whilst remaining mindful of our tax compliance obligations. We will only engage in tax structuring to the extent that it is aligned with our commercial business. We will not engage in artificial transactions. Where tax authorities introduce tax incentives and reliefs which are relevant to our business (for example R&D reliefs) we will seek to apply them in the manner intended by law.

In situations where tax laws may be unclear or subject to interpretation we proactively seek to identify, evaluate, manage and monitor these risks. Where there is significant uncertainty or complexity in relation to a risk, or the level of tax at stake is significant, advice will be sought from reputable independent external advisors.

Where we need to engage with tax authorities we will do so with honesty, integrity, mutual trust and respect and fairness and in a spirit of co-operative compliance and seek to resolve any disputed matters through pro-active and transparent discussion and negotiation.

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