

## Tax Strategy – financial year ending 31 March 2026

This document sets out the UK tax strategy of Whitworths Holdings Limited and its UK subsidiaries, including Whitworths Food Group Limited, KTC (Edibles) Holdco Limited, and their respective subsidiary undertakings (together, the “Group”). It is published in accordance with paragraph 16 of Schedule 19 to the Finance Act 2016 and applies to the financial year ending 31 March 2026.

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## 1. Introduction

Whitworths is the UK’s largest flour miller, operating from multiple locations across the UK. The Group produces a wide range of flour, maize, oil and rice products for customers including major food manufacturers, retailers, and independent bakers. Other activities include farming, estate management, and forestry. On 30 April 2025, KTC (Edibles) Holdco Limited and its subsidiaries were acquired by the Group and now form part of the Whitworths group, with Whitworths Holdings Limited as the ultimate parent company. Following the acquisition, KTC aligned its accounting period with the Group’s financial year end, resulting in a 15-month period ending 31 March 2026. This strategy applies to all UK taxes including Corporation Tax, VAT, PAYE, National Insurance Contributions, Customs Duties, and Stamp Taxes.

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## 2. Commitment to tax compliance and approach to tax planning

The Group is committed to complying fully with all applicable tax laws and regulations in the jurisdictions in which it operates. The approach to tax is consistent with the Group’s core values, including integrity, respect, dignity, openness, and trust. The Group aims to pay the right amount of tax at the right time, to comply with the tax law, and to maintain a transparent and constructive relationship with tax authorities. Tax planning decisions are undertaken responsibly and only where they support genuine commercial and economic activity in order to maximise value for our shareholders and employees. The Group makes appropriate use of government-approved reliefs and incentives, such as capital allowances and research and development tax reliefs, where available, and does not engage in aggressive, artificial, or abusive tax arrangements. Transactions between Group companies are conducted on an arm’s length basis, and the Group does not set targets or employee remuneration based on the after-tax results of the business. External professional advisers are engaged where appropriate to support significant or complex tax matters.

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### **3. Relationship with HMRC and other relevant parties**

The Group is committed to maintaining an open, honest, transparent, and cooperative relationship with HMRC. The Group engages constructively with HMRC's Customer Compliance Manager, responds to HMRC queries in a timely manner, meets all filing and payment deadlines, and operates a full and fair disclosure policy. Where errors or omissions are identified, the Group aims to disclose these promptly and work with HMRC to resolve matters efficiently. The Group also engages with relevant industry bodies, such as UK Flour Millers, to contribute to discussions on industry-wide matters and proposed legislative changes. The Group takes a prudent, low-risk approach to tax matters, ensuring that compliance obligations are met while maintaining commercial flexibility.

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### **5. Governance and tax risk management**

The Company Secretary, supported by the Group Accounting and Tax Manager, has responsibility for our approach to tax which is approved and overseen by the Board. The Company Secretary and CFO are also responsible for ensuring that effective policies and procedures are in place. Overall responsibility for the Group's tax strategy rests with the Board of Directors. Day-to-day responsibility for tax matters sits with the Company Secretary, who acts as Senior Accounting Officer for the relevant UK entities. The Company Secretary, Group Financial Controller and Tax Manager are supported by the wider Group Finance function. Each business division has its own finance team reporting into the Group Finance team and operating within Group-wide policies and controls. Tax risk management forms part of the Group's broader risk management framework, and the Group maintains a Tax Risk Register to identify, assess, and monitor tax risks. Significant risks are discussed at Board level. In line with the Senior Accounting Officer regime, the Group operates by covering Corporation Tax, VAT, PAYE/NIC, Customs Duties, and other relevant taxes to ensure appropriate tax accounting arrangements are in place. Tax and finance personnel maintain relevant professional qualifications and undertake ongoing training to ensure technical knowledge remains current.

This tax strategy will be reviewed at least annually and updated as necessary to reflect any changes in legislation, business structure, or tax practices, and will be published on the Group's websites in accordance with statutory requirements.