

# Accrol Group UK Tax Strategy

## Scope

### Introduction to Group structure

This strategy applies to Accrol Group Holdings plc and its UK subsidiaries (the 'UK Group') in accordance with paragraph 16 of Schedule 19 to the Finance Act 2016. A list of the entities to which it applies is set out below. In this strategy, references to 'Accrol' or 'the UK Group' are in respect of all of these entities.

This tax strategy was approved by the Accrol board on 26/04/2024 and was published online on 29/04/2024. Accrol regards publication of this tax strategy as fulfilling its obligations under paragraph 16(2) Schedule 19 of the Finance Act 2016 to publish its UK Group Tax Strategy for the financial year ended 30 April 2024.

This strategy applies from the date of publication until it is superseded. References to 'UK Taxation' are to the taxes and duties set out in paragraph 15(1) of the Schedule which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Land Tax. References to 'tax', 'taxes' or 'taxation' are to UK taxation and to all corresponding worldwide taxes and similar duties in respect of which the Group has legal responsibilities.

## Purpose

The aim of this document is to provide guidance and a framework within which the Group may operate. Accrol is committed to full compliance with all statutory obligations and full disclosure to relevant tax authorities. The Group's tax affairs are managed in a way which considers the Group's wider corporate reputation in line with Accrol's overall high standards of governance.

## Governance – UK taxation

- Ultimate responsibility for the tax strategy and governance resides with the Board of Directors of Accrol;
- The Accrol finance team is staffed with appropriately qualified and experienced individuals;
- The Board ensures that risks are identified, managed, and monitored within the businesses, with support and oversight by external tax advisors where appropriate.

## Risk Management

- The Group seeks to concentrate on tax strategic risk, that is risk considered fundamental or significant to the Group and its operations;
- Accrol operates a system of tax risk assessment and controls as a component of the overall internal control framework applicable to the Group's financial reporting system;
- The Group seeks to reduce the level of tax risk arising from its operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations;

- Processes relating to different taxes are allocated to appropriate process owners, who carry out a review of activities and processes to identify key risks and mitigating controls in place;
- Accrol reviews all major business developments for tax risk and appraises all tax risks quarterly to determine the key risks and identify those areas where most value may be added to the Group and the business;
- Accrol monitors and reviews new legislation and material business changes which may impact them to ensure that processes and controls are put in place to mitigate any newly created tax risk;
- Appropriate training is carried out for staff who manage or process matters which have tax implications
- Advice is sought from external advisers where appropriate.

### **Attitude of the UK Group towards tax planning and level of risk**

Accrol manages risks to ensure compliance with legal requirements in a manner which ensures payment of the appropriate amount of tax.

The Group's appetite for tax risk is consistent with a desire to achieve certainty in its tax affairs. The UK Group does not engage in artificial transactions in order to reduce UK tax.

The UK Group seeks to be transparent with regards to any filing position taken where there may be uncertainty as to the application and interpretation of tax law and seek external advice in relation to tax planning or areas of complexity or uncertainty.

The UK Group may utilise tax incentives or opportunities for tax efficiencies where these are aligned with the intended policy objectives of the governments introducing those incentives and, in particular, where they are aligned with business and operational objectives.

At all times Accrol seeks to comply with its regulatory and wider obligations and to act in a way which upholds its reputation as a responsible corporate citizen. In relation to any specific issue or transaction, the Board is ultimately responsible for identifying the risks, including tax risks, which need to be addressed and for determining what actions should be taken to manage those risks, having regards to the materiality of the amounts and obligations in question.

The UK Group has a zero tolerance on tax evasion including the activities which facilitate it and is committed to ensuring that its businesses meet the obligations of the UK Corporate Criminal Offence legislation.

### **Relationship with HMRC**

The UK Group is committed to maintaining openness and transparency in its approach to dealing with the Tax Authorities and complies with all relevant legal disclosure and approval requirements.

The UK Group's aim is to avoid unnecessary disputes with HMRC and seeks to work proactively and collaboratively on areas of uncertainty where appropriate in relation to the UK Group's current, future, and retrospective tax risks, and interpretation of the law in relation to all relevant taxes.

Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.

**List of entities covered by this Tax Strategy**

- Accrol Group Holdings Plc
- Accrol Holdings Limited
- Accrol Papers Limited
- Accrol UK Limited
- Art Tissue Limited
- John Dale (Holdings) Limited
- John Dale Limited
- Leicester Tissue Company Limited
- LTC Parent Ltd
- Severn Delta Limited