



Chesterfield Poultry Holdings Limited **UK Tax Strategy Statement**

For the financial year ending 30 June 2027

1. Introduction

This document sets out the Tax Strategy of Chesterfield Poultry Holdings Limited and its subsidiary undertakings (“the Group”). The Group is committed to managing its tax affairs responsibly, in accordance with both the letter and spirit of UK tax legislation, and maintaining full compliance with all relevant tax laws, reporting requirements, and disclosure obligations.

This Tax Strategy applies to Chesterfield Poultry Holdings Limited and all of its subsidiary undertakings, details of which are disclosed in the Group’s annual report and financial statements. The Tax Strategy has been prepared and published in accordance with the requirements set out in Paragraph 16 of Schedule 19 to the Finance Act 2016, which requires large businesses to publish their UK Tax Strategy annually.

The Group considers the publication of this document to meet its statutory obligation under Paragraph 16(2) of Schedule 19 for the financial year ending 30 June 2027. In accordance with Paragraph 16(4) of Schedule 19, this strategy is made freely and publicly available on the Group’s website at www.cplfoods.com.

The Tax Strategy outlines the Group’s approach to the management of its UK tax affairs, including governance arrangements, risk management, tax planning, and its attitude towards tax compliance and engagement with HMRC. It reflects the Group’s commitment to responsible tax conduct and transparent disclosure.

The Group’s approach to taxation reflects its wider business values of integrity, accountability, and sustainability. Tax compliance is considered an integral part of the Group’s broader corporate governance framework. Our approach supports the Group’s objective of delivering long-term, sustainable growth while safeguarding its reputation with stakeholders, customers, regulators, and the wider community.

2. Overview of Chesterfield Poultry Holdings Limited

Chesterfield Poultry Holdings Limited is the holding company of a well-established and vertically integrated poultry business operating in the United Kingdom. The Group’s core business activities encompass poultry farming, processing, packaging, logistics, and distribution, supplying fresh poultry products to retailers, wholesalers, and the hospitality sector.

The Group's subsidiaries include Chesterfield Poultry Limited, which undertakes poultry processing and sales; remaining of subsidiaries undertakes poultry farming, real estate and commercial property transactions.

The Group employs a substantial workforce and contributes significantly to the local economy, placing strong emphasis on ethical farming practices, food safety, and operational excellence.

The key taxes applicable to the Group's business operations include Corporation Tax, Value Added Tax ("VAT"), Customs Duties, Pay-As-You-Earn ("PAYE") income tax and National Insurance Contributions ("NIC"). The Group is aware of the importance of meeting all tax compliance obligations in a timely, accurate, and transparent manner.

3. Tax Governance and Risk Management

The Group recognises that robust governance and effective management of tax risks are critical to ensuring continued compliance and preserving its reputation. Responsibility for tax matters ultimately rests with the Board of Directors, who provide oversight and strategic direction in relation to tax governance.

Tax compliance is considered a key component of the Group's internal control environment and risk management framework.

Operational responsibility for day-to-day tax matters lies with the Group's Finance Director, who reports to the Board on tax compliance and risk. The in-house finance team, under the direction of the Finance Director, is tasked with ensuring all tax filings, payments, and disclosures are accurate, timely, and compliant with current legislation. The team also monitors any changes in tax laws and regulations that could impact the Group's tax position.

Given the complexity of certain tax areas, particularly those relating to VAT in the food sector and Customs Duties on imported goods such as feed, packaging materials, and processing equipment, the Group engages the services of reputable external tax advisers and accountants. These advisers provide specialist advice on complex transactions, ensure compliance with technical rules, and assist in reviewing the Group's tax returns and filings.

The Group has implemented detailed internal policies, controls, and procedures to identify, assess, and mitigate tax risks. These controls include regular internal audits, formal reviews of material transactions, and checks to ensure the accuracy of tax data reported to HMRC. The Group's risk management approach is proactive, with any material uncertainties or risks identified and escalated to the Board.

4. Approach of Tax Planning



The Group's approach to tax planning is guided by a strong ethical framework and is driven by commercial considerations.

Tax planning is always aligned with the Group's genuine commercial activities and operational objectives, ensuring that all transactions undertaken have clear business purpose and economic substance.

While the Group does not engage in aggressive tax planning or the use of artificial structures aimed solely at obtaining tax advantages, it does seek to utilise available tax reliefs and incentives intended by the government to encourage investment and economic growth. Examples of such reliefs include the Annual Investment Allowance ("AIA") and Structures & Buildings Allowance ("SBA"), which are claimed in respect of capital investment in processing plants, farm facilities, and distribution infrastructure. Where eligible, the Group also claims Research & Development ("R&D") Tax Credits for innovative projects, such as improvements in animal welfare, feed efficiency, waste reduction, and environmentally sustainable processing technologies.

Additionally, the Group ensures that it fully complies with the VAT rules applicable to the supply of food products, making appropriate use of zero-rating reliefs where eligible.

The Group also monitors its Apprenticeship Levy obligations and invests in employee development, ensuring maximum utilisation of available training funding.

All tax reliefs, allowances, and exemptions are claimed strictly in accordance with both the wording and intent of the legislation. The Group does not participate in any tax planning arrangements that could be perceived as contrived, lacking commercial rationale, or that would undermine the integrity of the tax system.

5. Tax Risk Appetite

The Group adopts a low-risk approach to taxation and has a clearly defined risk appetite. The Board is mindful of the financial and reputational consequences that could arise from non-compliance or involvement in aggressive tax arrangements. Consequently, the Group aims to ensure certainty in its tax positions by taking a cautious approach to areas of complexity or uncertainty.

Where the interpretation of tax legislation is not straightforward, or where significant judgement is required, the Group seeks advice from experienced external advisers and, where necessary, engages in dialogue with HMRC to obtain clarity and agreement. In cases involving complex transactions, such as group reorganisations, share-for-share exchanges, or significant capital investments, the Group may proactively seek Advance Clearance from HMRC to confirm the intended tax treatment.

The Group is aware that certain risks are inherent due to the constantly evolving tax landscape, including changes in domestic and international tax laws, VAT treatment of food production, and

Customs Duties in the post-Brexit environment. However, the Group continuously monitors these developments and takes appropriate steps to mitigate exposure to such risks.

6. Relationship with HMRC

Chesterfield Poultry Holdings Limited is committed to maintaining a positive, transparent, and collaborative relationship with HMRC.

The Group's objective is to be recognised as a compliant and cooperative taxpayer, dealing with HMRC in an open, honest, and professional manner at all times.

The Group ensures that all tax filings and disclosures are made accurately and submitted on time. Should any errors, discrepancies, or omissions be identified, these are disclosed to HMRC voluntarily and promptly, with corrective action taken as appropriate. In all dealings with HMRC, the Group seeks to provide complete and timely information, facilitating efficient resolution of any queries or audits.

Where areas of uncertainty or complexity arise, the Group does not hesitate to approach HMRC proactively, whether through informal discussions or formal clearance processes, to gain certainty and avoid disputes. The Group's approach to tax is underpinned by a desire to minimise risk, uphold integrity, and act responsibly in all tax matters.

7. Review and Approval

This Tax Strategy document has been reviewed and approved by the Board of Directors of Chesterfield Poultry Holdings Limited. It reflects the Group's continued commitment to maintaining high standards of tax compliance, responsible tax planning, and effective risk management.

The strategy will be reviewed annually, or more frequently if required due to significant business changes, developments in tax law, or shifts in the wider regulatory landscape, to ensure that it remains appropriate and aligned with the Group's objectives and values.

Signed:

A handwritten signature in black ink, appearing to read 'Jane Chen', with a stylized flourish at the end.

Name of Director: Jane Chen

Approved by the Board of Directors of Chesterfield Poultry Holdings Limited