

# Tyson's UK Tax Strategy

The information below outlines the tax strategy and risk management for all of Tyson's UK companies (the "Company") as it pertains to tax reporting for the year ending September 28<sup>th</sup>, 2024 (published pursuant to UK Finance Act 2016 paragraph 19 sub-paragraph (2) "The head of the sub-group must ensure that a sub-group tax strategy for the sub-group, giving the information required by paragraph 20, is prepared and published in accordance with this paragraph" and sub-paragraph 22(2) "The company must prepare and publish a company tax strategy, containing the information required by paragraph 23, in accordance with this paragraph.").

The Company is committed to the following:

- Complying with all applicable tax laws and regulations in all jurisdictions in a timely and accurate manner.
- Careful oversight of the processes and procedures involved in all tax related activities performed in the UK and ensuring that our tax governance is appropriate.
- Accurate and timely disclosure on all filings with HMRC. It involves disclosing relevant facts and circumstances to HMRC and claiming reliefs and incentives where available and in accordance with applicable legislation. Governance for the correct application of and compliance with UK tax law is a responsibility of the Board of Directors of each company and the specific responsibility of the respective Finance and Corporate Directors. Working with HMRC to ensure reasonable and accurate interpretation of the law.

## **Risk management and Governance Arrangements in relation to UK taxation**

- The Company has high governance standards. Tax risks and strategies are thoughtfully evaluated and must be approved by tax personnel and leadership prior to implementation.
- The Company has implemented a process across the business to ensure that appropriate governance of compliance with applicable laws and regulations is in place.
- Company personnel stays abreast of any changes in tax law through legislative updates.
- Segregation of duties is maintained between the tax preparation, review, and approval functions to ensure accuracy in reporting (including outsourcing of tasks as needed).
- All tax related documents must be reviewed and approved by appropriate management.
- The Company has low tolerance for risk of material errors in tax compliance. As such, the Company has implemented compliance policies and procedures to mitigate inaccurate reporting.
- As necessary, the Company engages 3<sup>rd</sup> party preparers to ensure adherence to applicable tax law.

## **Tax planning (affecting UK taxation)**

- The Company aims to support the commercial needs of the business by ensuring that the business is operated in the most tax efficient manner while remaining compliant with all relevant tax laws and regulations.
- The tax function is involved in the commercial decision-making process to provide thorough input as to the tax consequences of any potential activity.
- When entering into commercial transactions, the Company seeks guidance and support from external tax advisors when appropriate.

## **Risk Level accepted in relation to UK taxation**

- The Company is risk averse as it pertains to evaluating these tax consequences. As necessary, the Company engages 3<sup>rd</sup> party advisors to ensure appropriate technical tax guidance is provided.

## **Approach toward dealings with HMRC**

The Company is committed to the following:

- Accurate and timely disclosure in tax filings, query responses, and other HMRC correspondence.
- Strive to resolve tax controversy issues with HMRC, if any, through collaborative discussion.
- Working with HMRC to ensure reasonable and accurate interpretation of the law to evaluate past, current and future tax compliance.