

# Feed Factors Limited - Tax Strategy

The publication of this strategy statement is regarded as satisfying the statutory obligation under Para 16(2), Schedule 19, Finance Act 2016 for all companies. As the main company located and operating in the UK, we confirm that this strategy applies to the Group which includes Feed Factors Limited and all related UK companies, operations or branches as appropriate such as our parent company The Andersons, Inc. and Lansing Proprietary UK, Limited.

The Group's tax strategy is to:

- Meet all legal requirements and to make all appropriate tax returns, disclosures and payments while seeking to utilize available tax relief and incentives in a manner which is consistent with the government's policy objectives.
- Consider the tax impact in major or complex business decisions, such as acquisitions, as well as ongoing operations.
- Operate in an environment where we consider tax in the context of our reputation and brand.
- Apply professional diligence and care in the management of all risks associated with tax matters, and ensure governance and assurance procedures are appropriate.

## **Risk Management and Governance Arrangements**

We want our tax affairs to be transparent and compliant with tax legislation, and recognize that managing tax compliance and risk is increasingly complex. Risks will inevitably arise from time to time in relation to the interpretation of complex tax law. We actively seek to identify, evaluate, monitor and manage these risks. Responsibility for tax governance, strategy and risk lies with the Chief Financial Officer and is monitored and reviewed by internal tax specialists. Reliance is placed upon external tax advisers where there is a need for specialized guidance and support. There is oversight by the Board of the Chief Financial Officer and dialog on material areas of tax risk.

### **Tax Planning**

We undertake tax planning as part of our overall business strategy to maximize shareholder value. Any structuring that is undertaken will have commercial and economic substance, we will not put in place any arrangements that are contributed or artificial. Professional advice may be sought if a position is uncertain, with the depth of such advice being driven by our assessment of the risk and materiality presented by each situation.

#### **Attitude Toward Risk**

Our Board sees compliance with tax legislation as key to managing our tax risk. We understand the importance of tax in the wider context of business decisions and have processes in place to ensure tax is considered as part of our decision-making process. Our approach is to ensure we are compliant and understand our responsibilities with regards to tax, rather than looking for ways to aggressively avoid payment of tax.

#### Relationship with HM Revenue & Customs (HMRC)

We maintain a transparent and positive working relationship with HMRC with our focus on timely and accurate tax compliance. We are committed to prompt disclosure and transparency in all tax matters. We employ the services of professional tax advisers to act as our agents, and in many cases, they liaise with HMRC on our behalf. Should any dispute arise regarding the interpretation and application of tax law, the Group is committed to addressing the matter promptly and resolving it in an open and constructive manner.