

Barentz Global Tax Strategy

Introduction

This Tax Strategy applies to Barentz Group for the year ending 31 December 2024. It will be reviewed and updated annually.

About Barentz

Barentz is a global life science and specialty performance ingredients distributor. Barentz is an ingredients distributor specialized in human nutrition, pharmaceuticals, personal care, performance materials, and animal nutrition, creating unique synergies across all fields of expertise. For our customers, we provide access to the best ingredients solutions available to add value. We are ambassadors, technological experts, networkers, and a business platform connecting ingredients manufacturers and users across all areas.

Additionally, we source complementary ingredients, formulate custom products, and apply our market and technological knowledge. As a result, we deliver better ingredient solutions for our customers, for consumers and for the planet that help them innovate, simplify, and grow their business in a sustainable way.

Our Code of conduct

At Barentz, we have certain core values and guiding principles that are essential to our business operations and are key to our ambition to deliver sustainable and profitable growth. By giving people the freedom to act and empowering them to drive business forward, Barentz has established a dynamic and entrepreneurial culture. Integrity, transparency, and compliance are our core business values that promote a climate of trust and respectful partnerships with our suppliers and customers. With these values in mind, Barentz has created a culture where integrity is essential to the way we do business and where unethical behavior will not be tolerated.

Barentz does not tolerate any form of fraud, corruption, or bribery, including illegal facilitation payments, in connection to its operations and is committed to bribery prevention. We expect our employees and our business partners to follow Barentz's policy towards fraud, bribery, gifts and illegal payments.

This commitment extends to paying appropriate taxes. It is of great significance to Barentz and its stakeholders to contribute to jurisdictions in which it engages in business activities.

Our compliance to taxes

Barentz seeks to act as a responsible, compliant taxpayer that engages in and nurtures long-term relationships with the authorities while stimulating local business, meeting the needs of its stakeholders and of its partners.

If needed to ensure alignment between the Barentz tax function and the business amendments may be made to this document.

Barentz tax function

Barentz has a well-equipped and professional Tax department, headed by a Head of Tax with appropriate professional qualifications. The tax department reports directly to the Group CFO and has direct access to the management board.

The Head of Tax is responsible for global tax strategy and its implementation in the local jurisdictions. Barentz operates in more than 70 jurisdictions through a model whereby country managers monitor the local tax function and compliance, with the aid of local counsel where appropriate. All key tax decisions and potential tax issues are reported to the head of tax to ensure compliance with this tax policy paper and the applicable tax control framework.

To ensure compliance and alignment, this global tax policy will be communicated to country managers, and adherence to this policy is regularly monitored by the tax department.

Tax follows business

Barentz's tax function follows its business activities. The overall tax function and decision making seeks alignment with our commercial strategy and does not cater for abusive tax structures. Barentz strongly focuses on compliance, acknowledging that non-compliance with applicable tax legislation may damage its reputation.

In jurisdictions where it engages in business activities, Barentz aims to have an appropriate local presence, to be(come) deep-rooted in local jurisdictions and build lasting relationships. At all times, this requires local Barentz entities to comply with local legislation on substance, but generally local presence will exceed legal requirements: as the tax functions generally follows the business, the taxable presence typically matches economic activities.

Barentz prides itself on its global network and, whereby maintaining good relationships and building trust is essential to its success. Barentz seeks to contribute to the jurisdictions in which it does business by timely paying taxes and contributions due. The Barentz tax team works with the senior management team for each legal entity to ensure that all statutory responsibilities are met and that the tax treatment of transactions follows the commercial nature of these transactions.

Our approach to tax planning

Generally, Barentz's tax strategy aims to avoid double taxation, optimize the tax structure within the framework of this policy and applicable legislation, while, therefore, avoiding abusive tax structures or transactions. Barentz seeks to avoid aggressive tax planning as its approach to tax opportunities and accompanying risks is conservative. All decisions made around tax planning policy will fully comply with the principles outlined in this tax policy and the applicable tax control framework.

As part of this, Barentz will not take a position for tax purposes without strong technical arguments present. If the tax laws are unclear or subject to divergent interpretation, Barentz may decide to seek external advice or advance clearance from tax authorities. Decision made in respect of determining the level of acceptable tax risk will be taken by the local Board of Directors, with input provided by the professionals in the Tax Department. Where appropriate, the decision may be escalated to the global Barentz board.

Tax compliance

Barentz commits itself to comply with all applicable tax and reporting laws and regulations. This includes reporting for transfer pricing purposes or under DAC6 (mandatory disclosure), provided legal requirements are met. Should an issue be identified in respect of a historical position and/or process, this will be corrected at the earliest opportunity by the impacted entity.

In jurisdictions where it has a taxable presence, Barentz Group will timely report and make payment of the appropriate amount of tax. Barentz may apply tax reliefs or incentives offered by law where it considers this to be appropriate, in line with its business activities and both the letter and the spirit of applicable tax laws.

Where possible, Barentz will engage with the tax authorities to discuss uncertain tax positions with a view to obtain certainty on its application. In its dealings with the tax authorities, Barentz Group is transparent as to the facts at hand and its intentions. Barentz will not seek confirmation on any tax position or transaction if it does not consider that position or transaction to be in line with applicable tax laws and positions disclosed in tax returns globally will only be included where these are consistent with applicable tax laws.

Relationship with tax authorities

Barentz engages with tax authorities constructively, seeking to establish transparent and cooperative relationships, build on trust.

To facilitate this goal, Barentz aims to be transparent and provide requested information unless there are valid concerns as to the requirement to provide such information under the applicable tax laws. Barentz proactively engages with the Dutch tax authorities to frequently discuss its tax position and general strategy and will adopt a similar approach with other tax authorities as appropriate.

It is acknowledged that there may be areas of differing legal interpretations on tax matters between Barentz and tax authorities. Where this occurs, we will engage with tax authorities to try to resolve the matters in a timely manner.

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Appendix - UK specific requirements

The UK tax resident companies in the Barentz Group regard this tax strategy as meeting their requirements in accordance with UK legislation contained in paragraphs 19(2) and 22(2) of Schedule 19 in Finance Act 2016.

References to 'tax authorities' include HMRC in the UK along with all other tax and government authorities in the countries in which the Group operates.