

The following tax strategy applies to Nefab Packaging UK Ltd. This document complies with the transparency requirement introduced in Paragraph 19(2), Schedule 19 of the UK Finance Act 2016 whereby certain businesses in the UK are required to publish their tax strategy as it relates to UK taxation. This statement is published for the year ended 31 December 2022 and has been approved by the Board of Directors.

1. INTRODUCTION AND PURPOSE

Nefab is a Swedish multinational group which saves environmental and financial resources by optimizing supply chains. The group do this by innovating together with their customers to create smarter packaging and logistics solutions while always respecting people and high ethical standards. This contributes to a better tomorrow for customers, for society, and for the environment. The worldwide group employed over 3,643 employees in 2021 and the worldwide consolidated turnover for the period ended 31 December 2021 totalled SEK 6,600 million.

As outlined by Nefab's Code of Conduct, ethical business behaviour is one of Nefab's cornerstones. It also outlines rules for all individuals who perform work on behalf of Nefab to ensure compliance with applicable laws, rules as well as regulations at all times.

This tax strategy (the "Strategy") serves as a framework to align all processes regarding tax assessments and tax payments in the light of the above.

2. TAX STRATEGY

2.1. RISK MANAGEMENT AND GOVERNANCE

Nefab Packaging UK Limited ("Company" / "Nefab UK") is the UK sales company and wholly-owned subsidiary of the Nefab Group ("Group") which is headquartered in Sweden. The Company's principal activity is that of the retail of plywood packaging containers. There are no other UK entities in the Nefab group.

Nefab UK aims and strives for its tax affairs to be fully compliant with the UK legislation as well as subsequent tax payment obligations in all its global operations. In order to be compliant, Nefab UK maintains an effective control environment to review, manage and reduce exposure to the risk of non-compliance.

The responsibility of implementing the global tax policy ("Global Strategy") is divided between different levels of the Group. The UK Tax Strategy ("UK Strategy") is consistent with the Global Strategy.

The ultimate responsibility for the UK Strategy and managing tax risk in the UK lies with The Board of Directors. The daily management and supervision on a global level is performed by the Global Chief Financial Officer and on a regional level by the regional management of the Nefab Group. Employees in the local companies are responsible for adherence to the local taxation regulations.

The General Manager is responsible for ensuring that the UK Strategy is understood by his or her direct reports and for supervising its implementation. The Financial Manager is responsible for the daily adherence to the UK Strategy.

The functional responsibility for tax matters rests within the finance function, which is focused on compliance with applicable laws, rules as well as regulations relating to taxes (from hereafter "Tax Laws") as well as maintaining quality in the deliveries and keeping deadlines, to avoid unnecessary taxes and other charges.

Nefab UK appoints an external firm of professional tax advisers who provide tax advice if the Company is uncertain on the application of relevant laws. The business relies upon these advisers to make them aware of relevant new and/or updated tax legislation in order to reduce the risk of any inadvertent non-compliance. The corporate tax returns of the Company are prepared and submitted by an external adviser, following review and approval by an appropriate official of the Company.

UK payroll and VAT are prepared internally in a Making Tax Digital compliant manner. This is undertaken by experienced staff who are responsible for keeping up to date with legislative updates to ensure

compliance is maintained and that internal policies and procedures are updated accordingly, with the support of professional external advisors.

2.2. ATTITUDE TO TAX PLANNING /TAX PLANNING

Nefab UK views timely payment of taxes and adherence to Tax Laws as a clear responsibility required to align with the values of ethical business behavior outlined in the Code of Conduct, as well as being conduct that brings positive socio-economic aspects to the societies they operate in. While organizing the business, Nefab UK considers local and global Tax Laws and acknowledges their responsibility to contribute with a fair and reasonable amount of tax in the different local jurisdictions where they operate.

Under the Group's code of conduct, the business considers tax as an economic factor and acknowledges tax planning as a part of the business to ensure tax efficiency. However, it is Nefab UK's policy to pay the right amount of taxes wherever they operate, which means that a transaction or undertaking shall be based on sound and objective business and operational decisions of individuals responsible and not on tax impacts alone.

The Company strives to claim appropriate tax reliefs in line with the UK legislation, however only as these apply to the business' commercial operations and circumstances as they exist. Nefab UK does not conduct aggressive tax planning where the main purpose is to gain a tax advantage.

Nefab UK does not engage in tax avoidance activities and takes decisions based on their operational and business merits in line with the overall business strategy. Nefab UK calculates and aims to pay the right amount of taxes on all levels, based on a fair and sound assessment of sales and/or results locally. Internal transfer pricing shall be set consistently with those that would have been set between independent parties on an open market (the arm's length principle).

For all direct and indirect financial transactions, the appropriate local signing authority matrix must be followed.

The system used for recording operational transactions, whether an Enterprise Resource Planning ("ERP") system or otherwise, must be updated together or before a physical transaction is made.

2.3. MANAGING TAX RISK

Nefab UK adopts a low appetite approach to tax risk and aims to be fully compliant with UK tax legislation and pay the correct amount of tax, at the right time, in all jurisdictions. The Company strives towards obtaining a high degree of certainty and quality in both current and future tax liabilities.

Nefab UK faces many tax risks, which impose a requirement to be handled in an appropriate way regardless of the operational area within the group.

Acceptable levels of risk are approved on the basis of well-reasoned conclusions, following guidance on how the specific tax risk should be managed and compliance with relevant legislation. The Company may appoint an external firm of professional tax advisers to assist in identifying tax risks and determining appropriate action to mitigate any risks identified.

Nefab UK also seeks to manage its transfer pricing risks and aims to ensure that all arrangements are consistent with the OECD Transfer Pricing Guidelines and follow arm's length principles. The Group and the Company may appoint an external firm of professional tax advisers to assist in ensuring consistency to the relevant Tax Laws.

2.4. APPROACH TOWARDS HMRC AND OTHER TAX AUTHORITIES

Nefab UK's policy is to have transparent and open communication with HMRC, as well as other tax authorities and relevant bodies in established jurisdictions. The Company strives to comply with all reporting obligations and to ensure that deadlines for all filings and tax payments are met.

TAX STRATEGY

Nefab policies



Nefab UK is aware that from time to time, there may be disagreements with HMRC and other tax authorities. Nefab UK seeks to act in a professional and collaborative manner to resolve all such disputes on a timely basis. Where such disputes arise, Nefab UK may engage external advisors to help resolve the disputes promptly and fairly.