

## **Bestway Group Limited UK Tax Strategy**

This UK tax strategy applies to Bestway Group Limited and its UK based subsidiaries, referred to as “the Group”\*, and is published in accordance with Paragraphs 19(2) and 22(2), Schedule 19, of Finance Act 2016, which requires large groups to publish their UK tax strategy in respect of its UK entities (listed below), and is effective from year ended 30 June 2020.

### **Tax risk management**

This UK tax strategy is approved by the relevant Board of Directors and the day to day management of the Group’s tax affairs is the responsibility of the in-house tax manager.

The Group seeks to reduce the level of tax risk arising from its operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations.

The Group’s tax function proactively seeks to identify, evaluate, manage and monitor these risks. Where there is significant uncertainty or complexity in relation to a risk, external advice is sought.

The Group ensures appropriately qualified individuals are within the business to meet their tax compliance requirements and to assess tax risk. Where an assessment is made that the Group does not have the relevant expertise then external advice is sought.

### **Governance in relation to UK taxation**

- Ultimate responsibility for the Group’s tax strategy and compliance rests with the Board of Directors of Bestway Group Limited;
- The Board of Directors of Bestway Group Limited assigns responsibility for ongoing management of tax risk to the relevant Board of Directors of the Group’s main business units: Bestway Wholesale and Well Pharmacy.
- These businesses have Executive Teams whose responsibility it is to manage this risk.
- Material tax risk items are to be brought to the attention of the Board of Directors of Bestway Group Limited by the Board of Directors of the main business units.
- Day-to-day management of the Group’s tax affairs is delegated to the Tax Manager, with oversight from one of the following, dependent on the relevant entity they are responsible for:
  - Chief Operating Officer of Bestway Wholesale
  - Chief Financial Officer of Well Pharmacy
- The Board of Directors ensure that the Finance team is staffed with appropriately qualified individuals who understand tax and can meet the businesses’ tax compliance requirements and assess tax risk. If the Board of Directors feel that there is a lack in expertise then external support is obtained.

\* The Group includes the following companies:

Bestway Group Limited, Bestway (Holdings) Limited, Bestway Securities Limited, Bestway UK Holdco Limited, Bestway Northern Holdings Limited, Oakleaf Limited, Bestway Wholesale Limited, Bestway Northern Limited, Batleys Properties Limited, Palmbest Limited, MAP Trading Limited, Bestway Retail Limited\*\* and Bestway Panacea Holdings Limited\*

\*\* This entity has a group of companies that includes Ardiles Bidco Limited, KMD Enterprises Limited and Xcel Retail Limited

- The Board of Directors ensure that the Group's tax strategy is one of the factors considered in all investments and significant business decisions taken;
- The Board of Directors of Bestway Group Limited has ultimate responsibility and specifically oversees the following entities, with oversight assigned to the Chief Operating Officer of Bestway Wholesale as SAO:
  - Bestway Group Limited
  - Bestway (Holdings) Limited
  - Bestway Securities Limited
  - Bestway UK Holdco Limited
  - Bestway Northern Holdings Limited
  - Oakleaf Limited
- The Board of Directors of Bestway Group Limited assigns responsibility for management of tax risk to the Board of Directors of Bestway Wholesale Limited for the following entities, with oversight assigned to the Chief Operating Officer of Bestway Wholesale as SAO:
  - Bestway Wholesale Limited
  - Bestway Northern Limited
  - Batleys Properties Limited
  - Palmbest Limited
  - MAP Trading Limited
  - Bestway Retail Limited
  - Ardiles Bidco Limited
  - KMD Enterprises Limited
  - Xcel Retail Limited
- The Board of Directors of Bestway Group Limited assigns responsibility for management of tax risk to the Board of Directors of Bestway Panacea Holdings Limited (trading as Well Pharmacy) for the following entities, with oversight assigned to the Chief Financial Officer of Well Pharmacy as SAO:
  - Bestway Panacea Holdings Limited and its group of companies\*\*\*

\*\*\* Bestway Panacea Holdings Limited's group of companies includes Bestway Pharmacy NDC Limited, Donald Wardle and Son Limited, Care4U Pharmacy Limited, Bestway Panacea Healthcare Limited, G. Lightfoot & Son Limited, Thomas Hetherington Limited, P. Williams Chemists (Chester) Limited, Crown Imperial Associates Limited, Ideal Healthcare Limited, Portslade Medical Supplies Limited, Bestway National Chemists Limited, Ideal Healthcare Limited, Portslade Medical Supplies Limited, FA Parkinson (Chemists) Limited, Parkinson (Paisley) Limited, Bestway Belfast Chemists Limited, Pills Limited, RLJ Consultancy Limited and Ebbw Vale Consortium Limited

## **Risk Management**

- The Group seeks to reduce the level of tax risk arising from its operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations;
- Processes relating to different taxes are allocated to appropriate process owners, who carry out a review of activities and processes to identify key risks and mitigating controls in place. These key risks are monitored for business and legislative changes which may impact them and changes to processes or controls are made when required;

- The Group ensures appropriately qualified individuals are within the business to meet their tax compliance requirements and to assess tax risk. Adequate resources are made available and training provided to relevant individuals. Where there are areas of uncertainty, appropriate external professional advisors are engaged to provide specialist advice.

### **Tax planning and attitude to risk**

Our overall objective is to achieve certainty in our tax affairs. The Group is committed to compliance with tax law and practice. This means paying the right amount of tax at the right time. It involves disclosing all relevant facts and circumstances to the tax authorities, claiming reliefs, exemptions and incentives where applicable and in the spirit of relevant tax legislation.

When entering into commercial transactions, the Group seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation. The Group does not undertake tax planning unrelated to such commercial transactions. Where there is uncertainty on how to interpret tax law on any business transaction, The Group proactively engages with advisors and where applicable with tax authorities to seek certainty.

Intra-group transactions are entered into on an arm's length basis that reflect the business and commercial realities of the transaction and adhere to the relevant guidance issued by the taxing authorities of the respective jurisdictions.

The Group is committed to paying its fair share of taxation. The UK entities do not engage in artificial tax arrangements without business or commercial substance. The Group has a zero tolerance approach to tax evasion or the facilitation of tax evasion.

### **Relationship and approach to working with HMRC**

The Group is committed to the principles of openness and transparency and seeks a constructive relationship with HMRC through regular meetings, updates in respect of key developments in our business and communication regarding current, future and retrospective tax risks, and interpretation of the law in relation to all relevant UK taxes.

The Group seeks to discuss any tax issues arising at an early stage. When submitting tax computations and returns to HMRC, the Group reviews relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain.

Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.