



Silver Fern Farms - UK tax policy

Background

Silver Fern Farms Limited (“the Group”), is New Zealand’s leading marketer, processor and exporter of premium quality lamb, beef, venison and associated products. The Group was registered in 1948 as Primary Producers Co-operative Society, eventually trading as PPCS until it changed its name and its brand in 2008 to Silver Fern Farms.

The Group operates a United Kingdom (“UK”) based incorporated subsidiary, Silver Fern Farms Silver Fern Farms (UK) Ltd (“the Company”).

Scope of policy

This tax policy is published for financial year ending 31 December 2021 and onwards. The publication of this UK tax policy is regarded as satisfying the statutory obligation under section 161 and paragraph 22 (2), schedule 19, of the UK Finance Act 2016. This policy applies to the UK operations of the Company and Group.

We have outlined the Group and Company’s approach to taxation in the UK in further detail below.

Overview

- We have a fiduciary duty toward our shareholders to manage and plan our total tax costs of doing business, this must follow the law, rules, regulations and disclosure requirements. We also consider potential impacts on stakeholders and our reputation of any on-compliance.
- The day-to-day implementation of the tax policy is delegated to the finance team which has appropriately qualified professionals. Where necessary the finance team will take appropriate advice from external professional advisers.
- The board of directors believes in the importance of a strong compliance culture that is fully embedded across the business.
- We also recognise tax is an integral part of the Groups corporate social responsibility by paying the right amount of tax, at the right time and in the right place.
- We will seek to utilise available tax reliefs and incentives where available in a manner which is consistent with the government’s policy objectives.

Approach to risk management and the level of risk accepted

- We seek to identify and address tax risk in respect of all UK taxes by proactively identifying, monitoring and managing compliance.
- Where a tax risk is identified, matters may be escalated to appropriate senior management or the board of directors.

- We evaluate and manage business risks regularly, consider and apply changes in legislation.
- We do not have any performance objectives based on effective tax rates or tax payments.
- We obtain advice from external professional advisers where necessary to ensure all local compliance requirements are met. Professional advisers are selected with reference to skills, experience and value.
- The Group does not accept any form of behaviour that facilitates the evasion of tax, whether in the UK or in any other jurisdiction. The Group is committed to ensuring that it has procedures in place to prevent tax evasion by any one acting on its behalf.
- We comply with OECD transfer pricing principles.

Attitude towards tax planning

- When entering into transactions or making changes to our business, we assess what we must do to remain compliant with tax legislation and policy and then take appropriate steps to achieve this.
- We engage in sustainable planning, this includes analysing and managing the tax impacts of current and future business operations and transactions (including supply and value chains, structure, organisations, assets, investments and financing). This is based on genuine business rationale and with a long-term view of sustainability and predictability.
- We will ensure tax personnel keep up to date with new tax legislation and policy by attending suitable training courses, professional seminars and by technical reading so they can identify risks associated with the changes on current or future business operations.
- We will regularly update our internal stakeholders and will update HMRC on material matters affecting all aspects of management of UK and worldwide taxes.

Open and transparent relationship with HMRC and other tax authorities

- We will pay the right amount of tax at the right time as agreed by HMRC.
- We will engage in open dialogue with the tax authorities, acting in a cooperative, compliant and transparent manner.
- We will discuss material issues at an early stage with the tax authorities, and where possible in advance of implementation.
- If an error is discovered, we will make a voluntary disclosure to the tax authorities in order to correct the situation on a timely basis.

