

Country Style Foods Limited Tax Strategy

Scope

This strategy applies to Country Style Foods Limited and to the group of companies headed by Country Style Foods Limited in accordance with paragraphs 19 and 25 of Schedule 19 to the Finance Act 2016. A list of the entities to which it applies is set out below. In this strategy, references to Country Style Foods Limited, 'the firm' or 'the group' are to all these entities. This tax strategy was published on 26/04/2019 and the company regards this publication as complying with its duty under paragraph 16(2) Schedule 19 FA 2016 in its financial year ended 28/04/2018.

This strategy applies from the date of publication until it is superseded. References to 'UK Taxation' are to the taxes and duties set out in paragraph 15(1) of the Schedule which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Land Tax. References to 'tax', 'taxes' or 'taxation' are to UK taxation and to all corresponding worldwide taxes and similar duties in respect of which the Group has legal responsibilities.

Aim

Country Style Foods Limited is committed to full compliance with all statutory obligations and full disclosure to relevant tax authorities. The group's tax affairs are managed in a way which takes into account the group's wider corporate reputation in line with Country Style Foods Limited's overall high standards of governance.

Governance in relation to UK taxation

- Ultimate responsibility for Country Style Foods Limited's tax strategy and compliance rests with the Board of Country Style Foods Limited;
- Executive management of the group is delegated by the Board to the Managing Director of Country Style Foods Limited
- The Board's requirement to monitor the integrity of Country Style Foods Limited's financial reporting system, internal controls and risk management framework, expressly includes those elements relating to taxation;
- The Managing Director is the Board member with executive responsibility for tax matters;
- Day-to-day management of Country Style Foods Limited's tax affairs is delegated to the Finance Director, who reports to the Managing Director
- The Finance team is staffed with appropriately qualified individuals;
- The Board ensures that Country Style Foods Limited's tax strategy is one of the factors considered in all investments and significant business decisions taken;
- The Managing Director reports to the Board on Country Style Foods Limited's tax affairs and risks during the year.

Risk Management

- Country Style Foods Limited operates a system of tax risk assessment and controls as a component of the overall internal control framework applicable to the group's financial reporting system;
- Country Style Foods Limited 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;
- Appropriate training is carried out for staff outside Tax team who manage or process matters which have tax implications;
- Advice is sought from external advisers where appropriate.

Attitude towards tax planning and level of risk

Country Style Foods Limited manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax as it falls due.

When entering into commercial transactions, Country Style Foods Limited seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation. Country Style Foods Limited does not undertake tax planning unrelated to such commercial transactions.

The level of risk which Country Style Foods Limited accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the group's tax affairs. At all times Country Style Foods Limited seeks to comply fully with its regulatory and other obligations and to act in a way which upholds its reputation as a responsible corporate citizen. In relation to any specific issue or transaction, the Board is ultimately responsible for identifying the risks, including tax risks, which need to be addressed and for determining what actions should be taken to manage those risks, having regard to the materiality of the amounts and obligations in question.

Relationship with HMRC

Country Style Foods Limited seeks to have a transparent and constructive relationship with HMRC through regular meetings and communication in respect of developments in Country Style Foods Limited's business, current, future and retrospective tax risks, and interpretation of the law in relation to all relevant taxes.

Country Style Foods Limited ensures that HMRC is kept aware of significant transactions and changes in the business and seeks to discuss any tax issues arising at an early stage. When submitting tax computations and returns to HMRC, Country Style Foods Limited discloses all 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.

Country Style Foods will

- Fulfil statutory requirements to make returns and payments to the tax authorities within relevant statutory time limits.
- Adopt an open and honest approach with the relevant authorities
- Ensure that processes are sufficiently robust to manage effectively areas of tax risk
- Ensure tax disclosures are in accordance with relevant UK accounting standards and Company law

- Ensure that business processes enable the clarity of information to appropriately support claims for allowances

Transparency

We support a relationship with the tax authorities, based upon mutual trust and respect, which will enable constructive dialogue and responsiveness by all parties to fulfil our responsibilities.

List of entities covered by this Tax Strategy

Country Style Foods Limited

Midland Bakery Limited

Country Style Foods (Europe) Limited

Chilled Bakery Products Limited

Elisabeth the Chef Holdings Limited

Elisabeth the Chef Limited

Giles Foods Limited