

Bestway Group Limited UK Tax Strategy

This UK tax strategy applies to Bestway Group UK 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.

This tax strategy was published on 10 April 2025 and the Group regards this publication as complying with its duty under paragraph 16(2) Schedule 19 FA 2016 in its financial year ended 30 June 2025.

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 Finance teams in conjunction with support from external tax advisors.

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 finance function along with reliance on support from external advisors proactively seeks to identify, evaluate, manage and monitor these risks.

The Group ensures appropriate utilisation of its existing finance team and external tax advisors to meet its tax compliance requirements and to assess tax risk.

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 UK Limited;
- The Board of Directors of Bestway Group UK 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 UK 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 Financial Officer of Bestway Wholesale
 - Chief Financial Officer of Bestway Healthcare
 - Financial Controller of Group
- 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 UK Limited, Bestway UK Holdings Limited, Bestway UK FinCo Limited, Bestway Wholesale Holdings Limited, Bestway Wholesale Limited, Bestway Northern Limited, Batleys Properties Limited, Palmbest Limited, Adam Foodservice Trading Ltd, Eve Transport Ltd, MAP Trading Limited, Bestway Retail Limited** and Bestway Healthcare 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 UK Limited
 - Bestway UK Holdings Limited
 - Bestway UK FinCo Limited
 - Bestway Wholesale Holdings Limited
- The Board of Directors of the Group 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
 - Costcutter Supermarkets Holdings Limited
 - Costcutter Supermarkets Group Limited
 - Simply Fresh & Simply Local Limited
 - Ebor Foodmarkets Limited
 - Adam Foodservice Trading Ltd
 - Eve Transport Ltd
- The Board of Directors of the Group 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 Healthcare Holdings Limited and its group of companies***

*** Bestway Healthcare Holdings Limited’s Group of companies includes Bestway Healthcare Finco Limited, Bestway Panacea Holdings Limited, NDC Limited, Donald Wardle and Son Limited, Lexon UK Holdings Limited, Norchem Healthcare Limited, Dispex Limited, Lexon (UK) Limited, Key Pharmaceuticals Limited, Pharmdata Limited, Asurex Limited, Bestway National Chemists Limited, Bestway Belfast Chemists Limited, Frosts Group Limited, LP North Eleven Limited, LP North Thirteen Limited, John Bell & Croyden Limited, L&P 244 Limited, Frosts Pharmacy 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

The level of risk which Group accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the group's tax affairs.

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.