

Ali Group – UK Tax Strategy

The publication of this strategy statement is regarded as satisfying the statutory obligation under Para 19(2), Schedule 19, Finance Act 2016. The tax strategy and principles set out herein applies to all UK taxation matters for all of the UK subsidiaries of the Ali Group ("we" or the "Group"), for the year ended 31 August 2023, which are listed in Appendix 1.

This tax strategy has been approved by the Ali Group Corporate Tax Team.

Pursuant to the UK Finance Act 2016, Schedule 19 Part 2, par. 17(1), the following principles are provided:

- (a) The approach of the Group to risk management and governance arrangements in relation to UK taxation;
- (b) the attitude of the Group towards tax planning (so far as affecting UK taxation);
- (c) the level of risk in relation to UK taxation the Group is prepared to accept; and
- (d) the approach of the Group towards its dealings with HMRC.

Tax strategy

The Group's tax strategy applies to all UK companies and employees and communicates its intent to act as a good corporate taxpayer by effectively managing its tax risks and governance arrangements.

The Group recognises its corporate responsibility to ensure that all its businesses follow responsible tax practices to enhance long-term shareholder value whilst also contributing to public expenditure and the overall welfare of the communities in which it operates.

Accordingly, the tax strategy sets the core principles of compliance, fairness, value and transparency for the management of the Group's tax affairs.

The Group seeks to record its profits across the subsidiary companies around the world on an arm's length basis in accordance with internationally accepted best practices.

Its key strategic objectives in relation to tax are as follows:

- To follow all applicable laws and regulations in relation to all taxes;
- To pay the right amount of tax at the right time;
- To ensure the Group has robust and fitting governance to deliver appropriate tax accounting arrangements;
- To maintain an open and collaborative relationship with the tax authorities; and
- To apply diligence and appropriate care in carrying out our tax responsibilities and reporting.

Risk management and governance

Ultimate responsibility for the oversight and monitoring of UK risks and governance arrangements sits with the Ali Group Corporate Tax Team, which comprises of the Vice President of Tax and other

tax team members in the US and EMEA. Day to day management of the Group's UK tax affairs is undertaken by the individual finance teams of the companies listed in Appendix 1.

The Group pays and collects significant amounts of taxes, as a result of its business activities. It seeks to manage its UK tax obligations in compliance with all applicable tax laws and regulations, as well as in line with internal codes of conduct.

Accordingly, the tax contribution by the individual businesses is monitored and robust standard tax compliance processes operate together with appropriate financial controls to ensure that all tax returns are complete, accurate and filed on a timely basis with tax authorities and the declared taxes paid on time.

Tax laws are often complex, which creates a risk of incorrect interpretation. Where this occurs, the Group may reduce uncertainty through various actions, including proactive discussion with the fiscal authorities to obtain early resolution and securing external tax advice to ensure the robust interpretation of tax laws and practices.

Annual external audits and regular internal reviews aim to ensure that any tax risks are flagged and dealt with appropriately in a timely manner. Any commercial or structural change is reviewed with a tax impact assessment.

Attitude to tax planning and level of risk

UK tax planning arrangements are aligned with the operational needs of the business. The Group takes a low risk approach to tax planning and UK taxation (and does not enter into artificial arrangements designed to reduce tax) and seeks to maintain this through

- Paying the right amount of tax and submitting all tax returns on a timely basis;
- Utilising available tax incentives, reliefs and exemptions in line with and in the spirit of tax legislation when entering into commercial transactions;
- Maintaining tax accounting arrangements which are robust and accurate and comply with local regulations and other obligations;
- Taking action to ensure that it meets transfer pricing disclosures and documentation requirements set by tax authorities;
- Having a zero-tolerance attitude to tax evasion and the facilitation of tax evasion.

The Group, in collaboration with external UK tax advisors, meet at least once per year to review the UK business operations, tax compliance and governance arrangements. To the extent there are additional items identified during the year, a proactive approach is communicated with HMRC to ensure tax risk and governance alignment.

Working with HM Revenue and Customs

The Group aims to build positive working relationships with tax authorities by cooperating in a constructive, open, and timely manner. The Group discloses its tax affairs in its published accounts and taxation returns fully in accordance with the applicable standards and, where appropriate, will supplement its tax disclosures with further information to better inform its stakeholders.

The Group cooperates with HMRC, and other tax authorities as appropriate, to provide information that is relevant or required by law.

The Group makes tax payments and submits all required tax returns and disclosures in a timely manner.

Appendix 1

UK subsidiaries of Ali Group Holding S.r.l., covered by this tax strategy.

AFE Group Ltd (03872673)
AFG Stirling Ltd (SC206470)
Ali UK Ltd (03514409)
Blue Seal Ltd (03437267)
Burlodge Group Ltd (04107878)
Burlodge Ltd (02196073)
Carpigiani UK Ltd (02910954)
Coffeeing The World UK Ltd (15054000)
Enodis Group Ltd (04330202)
Enodis Hanover (05823053)
Enodis Holdings Ltd (04330209)
Enodis Industrial Holdings Ltd (02887689)
Enodis International Ltd (02992272)
Enodis Maple Leaf Ltd (06121244)
Enodis Oxford (05823051)
Enodis Property Developments Ltd (00493522)
Enodis Regent (05823110)
Enodis Strand Ltd (05848043)
Falcon Catering Equipment Ltd (00510510)
Manston (BR011365)
Merrychef Ltd (02739846)
Miller's Vanguard Ltd (00884957)
Mono Equipment Ltd (00537004)
MTW County Ltd (06483143)
Service Line Catering Equipment Engineers Ltd (02337742)
Welbilt (Halesowen) Ltd (01271570)
Welbilt Foodservice Holding Ltd (09927373)
Welbilt FSG UK Ltd (09836380)
Welbilt UK Ltd (02656967)
Williams Refrigeration Ltd (01504974)