

## **Tax Strategy Statement**

This statement sets out the UK tax strategy for Circana (UK) Ltd and any UK affiliates, in accordance with the requirements of Schedule 19 of the Finance Act 2016. This strategy is approved by the Board and is reviewed annually and applies for the financial year ended December 31, 2024. While this statement is specifically related to UK disclosures required by the UK Finance Act 2016, Circana as a group is committed to maintaining the highest standards of ethics and integrity and operates under this tax strategy as a group.

## **Our Approach to Tax Risk Management and Governance**

Circana is committed to acting with integrity and transparency in all tax matters. We maintain robust governance, oversight, and internal controls to manage our tax affairs responsibly and in compliance with UK tax law. Our Code of Conduct requires our directors, officers, and associates to comply with our ethical expectations and legal obligations, including applicable local laws.

- The Board of Directors has ultimate responsibility for tax governance.
- Day-to-day tax matters are managed by the Circana Tax function, which consists of appropriately qualified and experienced professionals.
- Significant tax risks or matters of judgment are reviewed and escalated to senior leadership or the Board, as appropriate.
- We maintain policies and procedures to ensure that tax risks are identified, assessed, and appropriately managed.

## **Our Attitude Toward Tax Planning**

Circana engages in tax planning that supports our commercial and economic activities. We do not engage in aggressive or artificial tax arrangements that are not aligned with the spirit of the law. We seek external advice on complex or uncertain matters to support our interpretation of tax law and ensure compliance.

## **Level of Tax Risk We Are Willing to Accept**

Circana values its reputation. We have a low tolerance for operational or planning tax risks that could damage our reputation or undermine our values. The size, complexity, and geographical footprint of Circana make it inevitable that tax risks will arise. To mitigate these risks, our tax and finance teams identify, evaluate, and monitor tax risks and routinely seek independent third-party professional advice and assistance in meeting our tax obligations and requirements.

## **Our Approach to Working with Tax Authorities**

Circana seeks to maintain transparent and cooperative relationships with tax authorities. We are committed to open, honest, and timely communication with tax authorities. We disclose relevant facts and circumstances in a clear manner and respond promptly to tax queries. We aim to resolve disputes in a constructive and cooperative manner and, where necessary, will pursue legal avenues to resolve disagreements in a respectful and professional way.