

The UK Tax Strategy Statement communicates the approach to the management of all UK taxes by UK entities (“the UK Group”) that are part of the Trivium Packaging Group (“Trivium”) and will be updated annually.

This document is published on Trivium’s website (www.triviumpackaging.com) accessible by the public free of charge in accordance with Schedule 19 of Finance Act 2016, and is in relation to the accounting year ending 31 December 2025. The UK Group considers the publication of this document as complying with its duties under paragraph 19(2) of Schedule 19 of Finance Act 2016.

Approach to risk management and governance arrangements in relation to UK taxation

The UK Group is committed to ensuring that all UK tax liabilities and reporting obligations are satisfied. In this regard, the UK Group has established internal protocols and procedures to ensure that all UK taxes are paid in full, all UK reporting obligations are satisfied, and UK tax laws and regulations are adhered to.

Proportionate procedures, including controls and policies, are in place to reduce the risk of tax fraud in accordance with the Corporate Criminal Offence (CCO) legislation enacted through the Criminal Finances Act 2017.

Trivium maintains a suite of documented tax process controls which are audited by the internal and external audit teams on an annual basis.

The Management Board of Trivium Packaging B.V. has ultimate responsibility for tax within Trivium. Executive management of Trivium’s tax affairs has been delegated by the Management Board to Trivium’s Chief Financial Officer. This responsibility and the core principles in this document are formalised in Trivium’s Tax Policy.

The UK Finance Manager, a team of tax specialists, and leading professional advisors where appropriate, has responsibility for managing all day-to-day tax matters and for ensuring that the UK Group fulfils its compliance obligations.

Materiality thresholds are applied to ensure that significant tax matters receive appropriate attention and governance. Materiality thresholds are not used in returns submitted to HMRC.

Attitude towards tax planning (so far as affecting UK taxation)

The UK Group is committed to acting with transparency on all tax matters, and to complying fully with UK tax law. In this regard, the commercial needs of the UK Group are paramount, and any tax initiatives are undertaken with this backdrop.

The UK Group does not enter into tax initiatives that do not have a business purpose and/or commercial rationale. In addition, due consideration is given to the UK Group’s reputation, brand, and corporate and social responsibilities when considering tax initiatives.

Level of risk in relation to UK taxation that the business is prepared to accept

The UK Group’s objective is to comply with its tax and legal requirements in a manner that ensures full compliance with UK tax laws. We consider that we have a low tax risk appetite.

Approach towards dealing with HM Revenue & Customs (HMRC)

The UK Group seeks to comply fully with UK tax law, making sure that all filings are submitted on a timely basis, with full disclosure, and that any areas of uncertainty and/or significant changes to the business are discussed with HMRC on a timely basis.

Trivium is committed to adapting to HMRC's digital transformation initiatives and continually reviews its processes to ensure efficient and accurate reporting.

Transfer Pricing and International Standards

Trivium, including the UK Group, adheres to OECD transfer pricing guidelines and applies the arm's length principle in all cross-border transactions. Trivium continually reviews its procedures to ensure alignment with evolving international standards, including the Pillar Two Global Anti-Base Erosion (GloBE) rules.

Adoption of Pillar Two Global Anti-Base Erosion rules

Trivium, including the UK Group, is subject to the Pillar Two Global Anti-Base Erosion (GloBE) rules. These rules aim to ensure that multinational enterprises pay a minimum level of tax regardless of where they operate. Trivium has reviewed its corporate structure in light of the introduction of the Pillar Two GloBE rules. Trivium operates in countries where local statutory rates (such as the UK) are above an effective tax rate of 15%. Based on analyses performed by Trivium, a safe harbour test is passed in each of the jurisdictions Trivium operates in, including the UK. Trivium therefore does not expect to be subject to Pillar Two top-up taxes and will continue monitoring the rules, ensuring it complies with them.