

Background and Strategy

Fiji Water (UK) Ltd. (“FWUK”) is a subsidiary of The Wonderful Company (“TWC”). TWC issues an International Tax Governance Policy, which sets out TWC’s overarching international tax strategy and international tax risk management framework.

Below is a summary of the tax strategy of FWUK for the financial year ended 31 December 2024, which is consistent with the wider TWC International Tax Governance Policy. This strategy is being published to comply with Schedule 19 paragraph 22(2) in Finance Act 2016.

Risk Management and Governance Arrangements

All TWC subsidiaries have an obligation to comply with the TWC International Tax Governance Policy. TWC is committed to conducting its international tax affairs in accordance with the following principles:

- Complying with applicable laws and regulations relating to international tax, including paying the fair and proper tax due and meeting tax compliance obligations in a timely manner.
- Ensuring the appropriate tax advice is sought and considered as part of the overall commercial assessment of significant transactions.
- Not participating in tax evasion or facilitating the evasion of tax by a third party.
- Maintaining open and constructive relationships with revenue authorities and avoiding unnecessary and time-consuming disputes wherever possible.
- To protect the reputation of TWC in relation to tax matters.
- Ensuring adequate resources are dedicated to maintaining high standards of tax risk management and governance.

The TWC International Tax Policy sets out the roles and responsibilities of key personnel involved in TWC’s international tax risk management and governance arrangements, and prescribes how risks should be identified and managed.

Attitude to Tax Planning

TWC conducts its business with honesty and integrity, which is in line with TWC core values and in compliance with its approach to tax. In assessing international tax risk, TWC considers the relevant legal requirements, the materiality of the amount, and the potential impact on TWC’s reputation, relationship with the tax authority and other stakeholders.

Tax planning may be undertaken where it is supported by genuine commercial rationale. Where alternative routes exist to achieve the same commercial result, the most tax efficient approach, in compliance with all relevant laws, will be considered. Contrived tax planning, where the tax benefit is disproportionate to the nature of the transaction, will not be undertaken.

Level of risk that the business is prepared to accept

International tax risks are evaluated through the assessment of the impact of the tax risk and are allocated a risk rating of “Low”, “Medium” or “High” according to a set risk rating matrix. The level of risk determines how matters are escalated and resolved.

Relationship with HMRC

TWC maintains an open and transparent relationship in its dealings with international tax authorities. Requested information is clearly presented and provided to the best of our abilities and in the timeframes requested or agreed.