

Limagrain Tax Strategy:

The flowing paragraph is published in accordance with the provisions contained in Schedule 19 part 1 and 2 of the UK Finance Act 2016 and sets out Limagrain approach to conducting its tax affairs and dealing with tax risks in the U.K for the year ending 30 June 2020.

The strategy detailed within is determined by the Limagrain Group in collaboration with the local management of its subsidiaries and is therefore applicable to every Limagrain entity located in the UK (i.e. Limagrain UK Limited, Hazera Seeds UK Ltd, Vilmorin 2014 Limited).

Limagrain is committed to:

- Following all applicable laws and regulations relating to its tax activities.
- Maintaining an open and honest relationship with the tax authorities based on collaboration and integrity.
- Ensuring that the tax strategy adopted is consistent with the Group's overall strategy
- Applying diligence and care in its management of tax risks and ensuring that its tax governance is appropriate.
- Using incentives and reliefs to minimize the tax cost of conducting its business while ensuring that these reliefs are not used for purposes which are knowingly contradictory to the intent of the legislation.

Risk management:

Attempting to avoid all tax risk would result in an overly heavy burden and is an unreachable objective. However, Limagrain is committed to try and ensure the minimum tax risk possible given its expert's knowledge, means and capacities.

Tax risks are assessed on a case by case basis, allowing Limagrain to arrive at well-reasoned conclusions on how each individual risk should be managed. Where there is uncertainty in how the relevant tax law should be applied, external advice is sought to support the Group's decision-making process.

When reviewing the tax risks associated with a specific decision, action or uncertain tax position, Limagrain ensures that all the following factors are considered:

- The legal and fiduciary duties of directors and employees.
- The potential financial costs involved, including the risk of penalties and interest.

- The maintenance of the Group's corporate reputation, having particular regard to the way it interacts with the communities around it.
- The wider consequences of potential disagreement with tax authorities, and any possible impact on relationships with them.

Limagrain has clearly defined lines of responsibility for its tax affairs, with decisions being taken in line with the Group's tax authority thresholds, ensuring that they are taken at an appropriate level.

Those reporting lines and thresholds are defined by the Group Tax Department in accordance with the mandate given by the Group Chief Finance Officer and Board of Directors.

In cases where the tax guidance is unclear or the Group does not feel it has the necessary expert knowledge to assess the tax consequences adequately, external advice is sought to support the Group's decision-making process.

Tax planning:

Tax planning is undertaken within the Group's tax risk management and governance framework which is an inherent part of its CSR engagements.

It is driven by the commercial needs of the business and anticipated future developments. Where alternative routes exist to achieve the same commercial results, the most tax efficient approach in compliance with all relevant laws is followed.

The commercial needs of the business will in no circumstances override compliance with all applicable laws and regulation. The tax function is therefore involved in decision making and provides appropriate input into business proposals to ensure a clear understanding of the tax consequences of main decisions made.

With this in mind, Limagrain does not undertake any artificial transactions with the aim of avoiding or minimising taxation through transfer pricing or other means. It ensures to the best of its ability that the OECD guidelines and BEPS principles are consistently applied and that profits are aligned with value creation.

Level of acceptable risk in relation to UK taxation:

As reflected in its attitude to tax planning and management of tax risks, Limagrain consider having a low risk approach in relation to UK taxation.

Approach towards dealings with HMRC:

The Group is committed to the principles of openness and transparency in its approach to dealing with HMRC, and in particular the Group commits to:

- Adopt open and collaborative professional relationships at all times with HMRC.
- Make fair, accurate and timely disclosure in correspondence and returns, and respond to queries and information requests in a timely fashion.
- Seek to resolve issues with HMRC in real time and before returns are filed if possible, and where disagreements arise work with HMRC to resolve issues by agreement where possible.
- Be open and transparent about decision-making, governance and tax planning.
- Reasonably believe that transactions are structured to give a tax result which is not inconsistent with the economic consequences (unless specific legislation anticipates that result), nor contrary to the intentions of Parliament.
- Interpret the relevant laws in a reasonable way, and ensure transactions are structured consistently with a co-operative relationship.