

Motor Fuel Group Tax Strategy

Introduction

Motor Fuel Group is the largest independent forecourt operator in the UK with around 900 stations operating under the BP, Shell, Esso, Texaco, JET and Murco fuel brands.

Paragraphs 19(2) and 22(2), Schedule 19, Finance Act 2016 requires the Group to set out the tax strategy of its UK companies listed in Appendix 1. This strategy covers all taxes and relates to the year ending 31 December 2022.

This tax strategy document, approved on 29th November 2022 by the Board of CD&R Tiger Holdco (Jersey) Ltd summarises the Group's policy and approach to managing its tax affairs and how it deals with tax risks. It was published on 29th November 2022 and will be reviewed annually by the Audit Committee and Board and is made freely available to the public.

MFG's Tax Mission Statement

The MFG group aims to:

- observe at all times relevant tax laws, rules, regulations, reporting and disclosure requirements,
- apply diligent professional care and judgement to ensure all decisions are well-considered and evidenced,
- ensure that the Group Tax Strategy and is aligned with the Group's business and commercial strategy,
- develop and foster proactive and transparent working relationships with all tax authorities and government bodies to minimise the extent of disputes, to achieve early agreement on disputed issues when they arise, and achieve certainty, wherever possible,
- when considering tax, ensure due consideration is given to the Group's overall strategy relating to corporate governance, internal risk management, social responsibilities and the value it places on engendering community trust,
- act with integrity and transparency at all times and to be trusted by all our business partners and stakeholders.

Key roles and responsibilities

The Chief Finance Officer (CFO), who attends Board meetings, is ultimately responsible for the Group's Tax Strategy and is also the Senior Accounting Officer.

The finance team is responsible for managing the Group's tax compliance obligations. Day to day tax responsibilities fall to the Group tax manager who reports to the Director of Group Financial Control and is overseen by the CFO. All three members in the tax reporting line hold recognised accounting qualifications.

MFG use reputable external tax advisors to provide tax technical expertise and additional resource based on an assessment of risk and requirements, such as:

- Advice on technical matters and uncertainties
- Advice on the tax impact of any significant changes to the business
- Assistance with tax filings including any relevant claims for tax incentives



Relationship with Her Majesty's Revenue & Customs (HMRC)

MFG consistently demonstrates the following approach:

1. MFG aims to be open and transparent with tax authorities
2. MFG aims to ensure compliance with all relevant legal disclosure requirements
3. MFG aim to maintain a strong and pro-active relationship with tax authorities
4. MFG will disclose any material errors identified in tax filings to HMRC in a timely manner

Management of UK tax risk

Managing tax risk is important for the Group and a review is undertaken periodically to identify areas of focus for the coming year. In addition to this, as and when a potential risk is identified, measures are put in place to prioritise and remediate controls gaps quickly and effectively.

Tax risks are highlighted to the Director of Group Financial Control and the wider finance team and discussed at Director and Board level.

There are two key drivers of tax risk

1. Tax planning and advisory risk which requires judgement

The Group will not enter into transactions designed principally to give a tax advantage. Any tax reliefs and exemptions are claimed based on advice from external tax advisors and in accordance with the spirit of the tax legislation and HMRC guidance where relevant.

2. Tax compliance risk relating to the processes, people and systems in place to manage tax risk

MFG seeks to reduce the level of tax risk arising from operations as far as reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect our compliance with tax obligations.

The Group's tax risk profile

Given the size and nature of the business with limited international tax exposure and the relative simplicity of the business model, the group considers the tax risk profile to be low overall and has a low appetite for tax risk.

Appendix 1 – MFG UK tax registered companies

AUK Investment Holdings Limited
AUK Investments Limited
Burns & Co. Limited
CD&R Firefly 2 Limited
CD&R Firefly 3 Limited
CD&R Firefly 4 Limited
CD&R Firefly Bidco Limited
CD&R Firefly Holdco Limited
CD&R Tiger Jersey Holdco Limited
Chartman Holdings Limited
Chartman Limited
Elite Fuels Limited
Fuel Stop (UK) Limited
George Hammond Limited
Gold Star FSL LLP
Goldstar Fuel LLP
Highway Stops Limited
Isle of Wight Fuels Limited
Kerr 1 Limited
Kerr 2 Limited
Leopard No. 2 Investments Limited
Leopard PEL Limited
Lupo Limited
Malthurst (UK) Limited
Malthurst Anglia Limited
Malthurst Estates Limited
Malthurst Limited
Malthurst Petroleum Limited
Malthurst Retail Limited
Malthurst South East Limited
Manor Service Stations Limited
Mercury Forecourts Limited
MFG EV Power Limited
Motor Fuel (No. 1) Limited
Motor Fuel (No. 2) Limited
Motor Fuel (No. 3) Limited
Motor Fuel (No. 4) Limited
Motor Fuel (No. 5) Limited
Motor Fuel (No. 6) Limited
Motor Fuel Group Limited
Motor Fuel Limited
MRH (GB) Limited
MRH Forecourts Limited
Peregrine Retail Limited
Premier Garage (Southgate) Limited
Refined Estates Limited

Refined Holdings Limited
Retro Properties Limited
Roadside Group Limited
Scimitar Midco Limited
Scimitar PFS 1 Limited
Scimitar Topco Limited
Scorpion Midco Limited
Scorpion PFS 1 Limited
Spring Petroleum Company Limited
St Albans Operating Company Limited