

▪ **Introduction**

The UK tax strategy applies to all relevant entities within the Molson Coors UK sub-group (“Group”) from the date of publication until it is superseded. This document encompasses the Molson Coors Global Tax Principles document.

The relevant entities are listed in Appendix I.

▪ **Our approach to tax risk management and governance**

The Group takes its tax compliance responsibilities seriously and seeks to be compliant with tax legislation. It is committed to paying the right amount of tax in the right place at the right time.

The principles governing the management of our tax affairs are fully aligned with the wider group’s worldwide commercial, sustainability and corporate governance practices, including compliance with all local tax law and regulations. We conduct transactions between entities on an arm’s length basis in accordance with the transfer pricing principles established by the Organisation for Economic Co-operation and Development (“OECD”).

The day-to-day implementation of the Group tax strategy and management of the Group’s tax affairs is provided by the in-house tax team with extensive knowledge and experience across all UK taxes.

The Group engages reputable, independent external advisors where there is a requirement for specialist advice or in respect of material transactions. External tax advisors are also used to assist with some of our tax compliance obligations.

The Group is subject to the Senior Accounting Officer (“SAO”) rules. The Finance Director UK and Ireland is our SAO for the purposes of paragraph 2, Schedule 46, Finance Act 2009 and certifies compliance with our UK tax obligations to HMRC on an annual basis.

The effective operation of controls to mitigate tax risk and any control failures are regularly monitored in line with internal risk and financial control management frameworks and SAO. Our adherence to internal controls and current tax regulation is regularly reviewed by Internal Audit and external independent auditors.

▪ **Our attitude towards tax planning and risk tolerance**

We do not enter into artificial or tax-motivated transactions of which the sole purpose is to avoid tax.

We consider tax efficiencies (e.g. utilisation of available reliefs, exemptions, incentives, etc.) in our activities provided there is commercial and economic substance, together with compliance with UK tax legislation and the spirit in which it was intended. Due consideration is given to wider factors such as corporate and social responsibilities, as well as the legal and fiduciary duties of directors and employees.

The Group proactively manages tax risk and employs an experienced team of tax professionals to oversee our tax affairs, obtaining external advice from reputable, independent advisors when appropriate. The Group has no set level of tax risk that it is willing to accept. Identified tax risks are assessed on a case-by-case basis, allowing the Group to make a robust judgement on how each risk should be managed.

▪ **Our approach towards working with HMRC**

We seek to maintain a regular and collaborative approach to relations with HMRC based on transparency, trust and respect.

Where there is material uncertainty of the application of prevailing legislation or where the transaction is material, we will engage with HMRC to determine and agree the tax position of key matters. If there is a difference of opinion with HMRC on the interpretation of the applicable legislation, we will seek resolution through discussion and negotiation.

We take care to ensure the Group's tax affairs are reported in an accurate and timely manner, and adopt an approach of full disclosure in all communications with HMRC. Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.

*Molson Coors regards publication of this document as complying with its duty under paragraph 19(2) Schedule 19 Finance Act 2016.*

Date published: July 2019

**Appendix I**

***List of entities covered by this tax strategy***

- Aspall Cyder Limited
- Aspall Holdings Limited
- Bittersweet Partnership Limited
- Caffrey's Limited
- Carling Brewers Export Limited
- Charrington and Company Limited
- Coors Brewers Limited
- Coors On-Line Limited
- Different World Drinks Company Limited
- Golden Acquisition
- Hooch Limited
- Molson Coors Beer Naturally Limited
- Molson Coors Brewing Company (UK) Healthcare Limited
- Molson Coors Brewing Company (UK) Limited
- Molson Coors Brewing Company (UK) Pensions Limited
- Molson Coors Brewing Company (UK) Russia Limited
- Molson Coors Holdings Limited
- Molson Coors Worthington Limited
- Sharp's Brewery Limited
- William Stones Limited
- Molson Coors Brewing International Limited