

UK Tax Strategy

Our approach to tax risk management and governance

We are committed to managing our tax affairs in a responsible manner. This means paying the right amount of tax, in the right place, at the right time, in compliance with tax rules and principles that align fully with our worldwide commercial, sustainability and corporate governance practices.

Our approach to tax is set at the enterprise level and approved by our Board of Directors. The Finance Director, Western Europe serves as our UK Senior Accounting Officer, and is responsible for ensuring that our UK Group has appropriate tax accounting arrangements in place. The day to day management of our UK tax affairs is overseen by a team of experienced in-house tax professionals, with support from reputable, independent external advisors.

We proactively manage tax risk and may seek external advice where material uncertainties arise to ensure that our interpretation of the relevant UK tax rules is appropriate. We may also seek to resolve uncertain tax positions directly with HMRC before a tax return is filed, in accordance with HMRC's framework for co-operative compliance. We do not have a set level of tax risk that we are willing to accept. Identified tax risks are assessed on a case-by-case basis, allowing us to make appropriate judgements on how each risk should be managed.

In accordance with our Global Group risk management procedures, our adherence to internal controls and current tax regulation is regularly reviewed by both our internal audit function and independent external auditors.

All transactions undertaken between business units, within our enterprise, are conducted on an arm's length basis in accordance with transfer pricing rules established by the Organisation for Economic Co-operation and Development (OECD).

Our attitude towards tax planning

We do not undertake artificial or tax-motivated transactions where the sole purpose is to avoid tax.

We will consider tax efficiencies (including tax reliefs, exemptions and incentives) where aligned with the economic and commercial activities of our business, and the spirit and letter of UK tax law. Due consideration is also given to wider factors, such as corporate and social responsibilities; and legal and fiduciary duties of Directors and employees.

Our approach towards working with HMRC

We are committed to working with HMRC in an open, transparent and collaborative manner consistent with maintaining our good working relationship. We will seek to ensure that HMRC is kept up to date with business developments, including any commercial transactions with potentially significant tax implications.

Where queries or misunderstandings may arise, we strive to manage these on the basis of full disclosure and we will seek to work with HMRC to bring any items to resolution.

Our UK tax strategy is published in compliance with paragraph 16(2) Schedule 19 Finance Act 2016 requirement for large businesses to publish their tax strategy and incorporates our Global Tax Principles. The strategy covers the year ended 31 December 2020 and applies to all UK entities within Molson Coors Beverage Company's worldwide Group, as listed in Appendix I.

21 September 2020

Appendix I

List of entities covered by our UK Tax Strategy

- Aspull Cyder Limited
- Aspull Holdings Limited
- Bittersweet Partnership Limited
- Caffrey's Limited
- Carling Brewers Export Limited
- Charrington and Company Limited
- Cobra Beer Partnership 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
- Molsom Coors Brewing International Limited
- Molson Coors Holdings Limited
- Molson Coors India Limited
- Molson Coors (UK) Holdings LLP
- Molson Coors Worthington Limited
- Sharp's Brewery Limited
- William Stones Limited