

JBT Marel Corporation

UK Tax Strategy

In compliance with Section 161 and Para 19(2) of Schedule 19 Finance Act 2016, JBT Marel Corporation is publishing its UK tax strategy for the tax year ending 31 December 2025, which will apply from the date of publication until superseded and will apply to all its UK group companies.

This UK Tax Strategy refers to taxes and duties in the UK which include:

- All corporate income taxes
- Indirect taxes including VAT, stamp duty
- Employment taxes including PAYE, National Insurance
- Other Applicable tax matters

JBT Marel's Approach to Risk Management and Governance

JBT Marel Corporation and subsidiaries ("JBT Marel") strive to comply with UK laws, rules, and regulations. The JBT Marel website states, under Corporate Governance, that JBT Marel strives to comply with all laws, rules and regulations of the places JBT Marel does business. It is the personal responsibility of each of the directors, executive officers and other employees to adhere to the standards and restrictions imposed by these laws, rules and regulations.

The UK tax strategy conforms with JBT Marel Guide to Ethical Conduct, our code of business conduct, and is owned and approved by JBT Marel Management and overseen by the JBT Marel Board of Directors and Audit Committee.

JBT Marel Management has delegated the day-to-day management of the company's tax affairs to the tax department under the direction of the Vice-President, Global Tax, who is supported by JBT Marel's Finance and Tax professionals to ensure compliance. We seek to identify, evaluate, monitor and manage tax risks to ensure that we are in full compliance with our legal obligations.

The JBT Marel Corporation core values and code of business conduct and ethics means that JBT Marel has a low tolerance for tax risk and endeavors to comply with tax rules and

regulations, reporting requirements, and payment obligations, and allows JBT Marel to identify, monitor, and mitigate potential tax risks.

The Finance and Tax teams regularly review existing processes and controls to ensure that these are fit for purpose and operating as intended. We also assess our UK processes and controls in light of the UK Criminal Finances Act 2017, and we take steps to ensure that these are enhanced where needed as part of our risk-based approach to compliance with the legislation. To further mitigate tax risks and to comply with UK tax rules, JBT Marel seeks tax advice as appropriate on a regular basis from external tax and legal advisors, which allows JBT Marel to support the businesses on tax decisions and to provide guidance with regard to the application of tax rules, including, but not limited to, incentives on capital allowances, group loss relief rules, research and development, patent box incentives etc., which helps manage JBT Marel's tax burden.

JBT Marel's Approach to Tax Planning

JBT Marel's global tax organization supports the commercial and investment needs of the business. When supporting the business we consider tax laws in all countries in which we operate. Factors that are considered include potential incentives and reliefs that are appropriate and associated with substantive business activities. We ensure any tax planning aligns with the business operations, enhances value, and minimizes tax risk across our global business, including the UK.

Transactions between JBT Marel related entities, both within the UK and overseas, are conducted on an arms' length basis and in accordance with OECD (Organization for Economic Cooperation and Development) principles.

JBT Marel's Relationship with HMRC

JBT Marel Corporation engages with HMRC, and all tax authorities, in a transparent, respectful, and cooperative manner. JBT endeavors to make all tax filings accurately and timely and to comply with applicable disclosure requirements. It is JBT Marel policy to provide complete and timely responses to HMRC correspondence and to work collaboratively to resolve any areas of technical uncertainty, engaging with external advisors as necessary to support us in meeting our compliance obligations.