

# Americold Realty Trust

## Americold Holdings UK Ltd and all its Subsidiaries

# Tax Strategy

*This policy has been published in compliance with paragraph 16(2) of Schedule 19 to the Finance Act 2016 and is in relation to the accounting period ended December 31, 2022. It will remain in force until it is next updated.*

### 1. Introduction

Americold Realty Trust, Inc. (“Americold” “the Company”, “We”) is a leading global publicly traded REIT focused on the ownership, operation, acquisition and development of temperature-controlled warehouses. The Company operates cold storage infrastructure and provides associated logistics services in North America, South America, Europe, and Asia-Pacific regions. Americold Holdings UK Ltd (formerly known as, “F/K/A”, Agro Merchants Holdings UK Ltd) and all its subsidiaries are referred to as Americold UK Sub-Group (“UK Sub-Group”). The companies in this UK Sub-Group are all registered in Northern Ireland and England. The primary trading companies are Americold Lurgan Warehousing Ltd (F/K/A Agro Merchants Lurgan Warehousing Ltd), Americold Lurgan Ltd (F/K/A Agro Merchants Lurgan Transport Ltd, Americold Whitchurch Ltd (F/K/A Agro Merchants Whitchurch Ltd), Lurgan RE 1 Ltd, Lurgan RE 2 Ltd, Whitchurch RE Ltd, TF Bowman & Son Ltd, and Bowman Stores Ltd. We strive to comply with all applicable laws and regulations and mitigate tax risks in each country where we operate.

### 2. Tax Governance, Risk Management and Compliance

The Vice President of Tax for Americold is responsible for managing the Company’s Tax function globally and leads a team of highly qualified individuals with specific geographic and technical responsibilities. The tax department is part of the Company’s headquarter finance organization, and reports to the Chief Accounting Officer (CAO) and Chief Financial Officer (CFO). The tax department regularly updates the CAO and CFO, including the Board of Directors, about significant tax matters including tax accounting, compliance progress, legislation changes, audits, and potential tax impacts of business plans.

UK finance personnel manage the routine tax processes relevant to their jurisdiction and collaborate with the corporate tax department as required. In addition to working closely with the Corporate Tax department, UK Sub-Group companies utilize external professional tax experts routinely to give advice on tax matters and to prepare tax computations and file tax returns. We seek advice from external advisors on material transactions and whenever the necessary expertise is not available in-house.

Controls and processes are developed and executed to meet external risk management regulations such as the Sarbanes-Oxley Act. The tax department is responsible for ensuring that the Company files tax returns in jurisdictions where it operates and has developed and implemented procedures and controls to manage changes in these obligations and ensure the overall integrity of the tax returns. The Company adheres to tax and financial related disclosures and transparency requirements of the United States and other countries where we do business including the UK. Transfer pricing (TP) policies are implemented to ensure that charges between group companies are at arm's length and properly documented, and TP filings are completed in a timely and accurate manner in jurisdictions where required.

### **3. Tax Planning and Level of Risk**

Tax planning is aligned with objectives of Americold's business operations. The tax department collaborates with other functional groups, such as legal, treasury, business development, and HR, and provides analysis of relevant tax issues in key transactions or strategies to maximize value on a sustainable level for the Company and the communities within which it operates. We do not pursue transactions that are contrived or artificial for the sole purpose of reducing tax. Local companies including the UK Sub-Group claim proper statutory reliefs in line with local legislation and never use marketed or abusive tax avoidance schemes. We strive to comply with applicable tax rules and regulations, including relevant transfer pricing guidelines, and take a conservative approach to tax risk, and seek assistance from external advisors' expertise in relevant jurisdictions and clarifications from governmental authorities as needed to ensure compliance with applicable tax rules and regulations, and minimize the risk of uncertainty and disputes.

### **4. Relationship with Taxing Authorities**

Americold is committed to transparent and professional relationships with tax authorities in countries where we operate. We work collaboratively with fiscal authorities to resolve disputes and to achieve early agreement.

In the UK, we are committed to an open, professional, and transparent relationship with Her Majesty's Revenue and Customs ("HMRC"). We strive to make full accurate disclosures on our tax returns and required filings and communicate in a timely and accurate manner to enable HMRC to carry out their reviews when requested.