

Bunge UK Tax Strategy

Year ended 31 December 2025

Introduction

Bunge is a leading global agribusiness and food company with integrated operations that stretch from farmer to consumer. The ultimate parent of the Bunge group is Bunge Global SA, domiciled in Switzerland and listed and traded on the New York Stock Exchange (NYSE) under ticker symbol "BG." Bunge has certain subsidiaries incorporated in the United Kingdom ("UK"). In 2025 the business combination between Bunge and Viterra was completed.

Bunge, including its UK subsidiaries, is committed to the highest standards of corporate governance and recognizes that strong governance is key in helping the business achieve its objectives whilst generating sustainable shareholder value.

As an essential part of this commitment, we operate within a well-defined governance structure (including a Code of Conduct) and embed governance principles and practices in the business. Bunge's Code of Conduct serves as a foundational guide for all members of its community, including employees, officers, Board of Directors and third parties such as contractors, agents and consultants. Its primary purpose is to ensure that business is conducted in an ethical and legal manner. Our Code of Conduct has been established upon its core values around safety, integrity, teamwork citizenship, and an entrepreneurial spirit with a strong emphasis on sustainability and operational excellence.

Our approach to tax is fully aligned to the wider global governance structure and our Code of Conduct. We actively engage with all our internal and external stakeholders, including His Majesty's Revenue and Customs ("HMRC") in a structured and transparent way that seeks to ensure robust tax risk management.

Over the past few years, the tax landscape has continued to evolve, including increased global transparency requirements and the introduction of the OECD's Pillar II rules. Bunge's governance and control framework continues to adapt to these developments.

Our approach to risk management and governance arrangements in relation to taxation

Risk management is an integral aspect of Bunge's corporate governance. The Audit Committee of our Board of Directors is responsible for the oversight of Bunge's tax risk management practices. The day-to-day ownership and management of our UK tax risks lies with regional management with oversight by the global tax team.

Ultimately, tax risk is minimised by taking all reasonable steps to ensure that any factors which could materially affect the company's tax affairs are given due consideration by the management with oversight at the Board of Directors level.

Bunge seeks to organise its affairs in the UK based on sound commercial principles and in accordance with relevant tax legislation. Where there are areas of uncertainty, we use independent external advisors to provide us with specialist support.

The key risks and controls for Bunge in the UK are highlighted below:

- a. Tax compliance and reporting risk – mitigated through robust internal controls, documented processes and the use of external advisors for UK tax filings.
- b. Transactional risk – mitigated via tax risk assessments for material business transactions and input from internal and external tax specialists.
- c. Reputational risk – mitigated through Bunge's strong internal control framework, low risk appetite and commitment to transparent and responsible business practices.

Tax risk appetite

The Bunge UK group has a low risk profile for all business risks including tax. As such the Bunge group is committed to complying with not only the letter of the law but also the intention of parliament.

In general, we discuss any uncertainty relating to tax risks with our external advisors. We may seek assurance from external advisors and HMRC to support us in maintaining our low tax risk appetite.

Our approach towards tax planning

The global Bunge group and local Bunge UK group may seek to be tax-efficient, but any tax planning must be driven by genuine commercial activity and aligned with our low risk appetite and our Code of Conduct.

We engage with external tax advisors to ensure technical alignment with UK legislation and the intention of Parliament.

We do not engage in artificial or aggressive tax planning.

Our approach towards our dealings with HMRC

We aim to maintain an open and transparent approach to our dealings with HMRC. In the event that we identify any issue in relation to our UK tax obligations, we would voluntarily disclose this to HMRC on a timely basis.

Global Minimum Tax (Pillar II)

Bunge has implemented internal processes to meet the requirements of the OECD's Pillar II Global Minimum Tax rules and related UK legislation where applicable. Compliance with these rules forms part of our broader tax governance and reporting framework.

Review schedule

The purpose of this document is to communicate our approach to tax to all stakeholders and meet the requirements of Schedule 19 of the Finance Act 2016.

It is reviewed annually and updated where necessary to reflect changes in tax legislation, Bunge's business or its governance framework.