



Mondi Group Tax Strategy

Introduction

This document has been approved by the boards of Mondi plc and Mondi Limited (the Boards) for publication in compliance with our duty to publish a Tax Strategy in accordance with Schedule 19 of the Finance Act 2016.

All statements contained within this publication apply on a Group basis, which includes, but is not limited to, our approach to UK taxation and our dealings with HMRC (the UK taxation authorities).

Our overall aim is to manage our tax affairs conservatively, consistent with our approach to all aspects of financial risk management.

Our approach to tax risk management and governance arrangements

The Boards are ultimately responsible for ensuring the tax affairs of the Group are managed effectively, consistent with the principles of financial management applied throughout the Group. The Chief Financial Officer is the Director responsible for the Group's tax affairs at Board level. There is an annual review by the Boards of the tax strategy of the Group.

Throughout the Group we have dedicated internal tax resources, supported by a centralised Group tax department, who take day-to-day responsibility for management of the Group's tax affairs. We maintain a detailed set of operational guidelines aimed at ensuring a robust tax control environment. In addition, we seek regular professional advice to ensure that we remain up to date with changes in tax legislation, disclosure requirements and best practices.

Our attitude towards tax planning

Whilst we seek to manage our tax operations efficiently, taking advantage of available incentives and exemptions, our objective is to do so in accordance with all applicable laws and regulations of the countries in which we trade.

As part of this, in accordance with OECD guidelines, our policy is that all intra-group transactions are conducted on an arm's length basis.

Our attitude towards acceptable levels of taxation risk

Whilst our aim is to manage our tax affairs conservatively, as Mondi operates in a number of countries, each with different tax systems, a degree of tax risk is inevitable as tax laws are complex and open to differing interpretations.

Tax risks are monitored on a continuous basis throughout the group, and more formally reviewed by the audit committee twice yearly as part of the reporting process.

Our approach towards our dealings with taxation authorities

Our intention is to maintain a constructive dialogue with tax authorities and to work collaboratively with them to resolve any disputes.

December 2018