



Agro Fair Europe B.V. and its Consolidated Subsidiaries

Additional Tax Information (Year Ended 31 December 2024)

This statement of additional tax information was compiled in partnership with the [Fair Tax Foundation](#) during March 2026.

The information presented ensures that Agro Fair Europe B.V. and its consolidated subsidiaries (“the Group”) meet the standards and requirements of the [Fair Tax Mark's – Global Multinational Business Standard](#).

The Fair Tax Mark label is the gold standard of responsible tax conduct and certifies that a business:

- seeks to follow the spirit, as well as the letter of the law;
- shuns artificial and aggressive corporate tax avoidance; and
- is transparent about profits made and taxes paid.

Tax contributions are the lifeblood of a flourishing society - funding essential services such as healthcare, education, policing and transport. Corporate tax avoidance doesn't just rob public services of vital revenue, it also undermines the ability of businesses to compete fairly and reduces national productivity. Across the world, there is a growing community of [Fair Tax Mark certified businesses](#) who believe in responsible tax conduct, spanning small businesses, listed companies, co-operatives and social enterprises.

Tax Policy

The Group is committed to paying all the taxes that we owe in accordance with the spirit of all tax laws that apply to our operations. We believe that paying our taxes in this way is the clearest indication we can give of being responsible participants in society. We will fulfil our commitment to paying the appropriate taxes that we owe by seeking to pay the right amount of tax, in the right place, and at the right time. We aim to do this by ensuring that we report our tax affairs in ways that reflect the economic reality of the transactions that we undertake during the course of our trade, and we seek to declare profits in the place where their economic substance arises.

We will not seek to use those options made available in tax law, or the allowances and reliefs that it provides, in ways that are contrary to the spirit of the law. Nor will we undertake specific transactions with the sole or main aim of securing tax advantages that would otherwise not be available to us based on the reality of the trade that we undertake. The Group will never undertake transactions that would require notification to relevant tax authorities under their disclosure regulations or participate in any arrangement to which it might be reasonably anticipated that general tax anti-abuse rules may apply.

We will never artificially lower our tax liabilities by shifting profits to low-tax or secrecy jurisdictions (tax havens). Any connections to, or trading with, places that are considered to be tax havens, will be for genuine economic purposes.

Our accounts will be prepared in compliance with this policy and will seek to provide all the information that users, including relevant tax authorities, might need to properly appraise our tax position.

The above policy applies to Agro Fair Europe B.V. and all of its consolidated subsidiaries.

Ultimate responsibility for the Group's tax policy and its implementation rests with Hans-Willem van der Waal, Chief Executive Officer, and the policy is reviewed annually.

We confirm that the Group has complied with its tax policy for the year ended 31 December 2024.

Group Information

The registered office address of Agro Fair Europe B.V. is: Koopliedenweg 10, 2991 LN Barendrecht, The Netherlands, which is also the primary trading address and head office of the Group.

The Group employs a two-tier corporate governance structure. This arrangement delegates executive management responsibilities to the Management Board, while oversight and supervision are entrusted to the Supervisory Board. The directors who held office during the year ended 31 December 2024 were:

Management Board member

- Hans-Willem van der Waal, CEO

Supervisory Board members

- Kees Rijnhout, Chairman
- Yoriely Villalobos Mora
- Yoni van der Veeken

Ownership

The joint ownership of the Group is part of a goal to empower producers and create cooperation throughout the fruit chain. Agro Fair Europe B.V.'s shares are divided between the AgroFair Producers Cooperative (CPAF) and a number of ethical investors. Along with its shareholding through the CPAF, the Group's major banana producer organisation 'El Guabo' also has a direct shareholding.

A detailed list of shareholders is shown below, along with explanatory footnotes:

Shareholder / Country	Class of shares	Number of shares	% interest
AgroFair Producers Cooperative BA; Netherlands	A & B	5,500	33.00
Altromercato Impresa Sociale soc. coop.; Italy	A	375	2.25
Inversiones Viva Ltd; Bahamas	A	2,500	15.00
Benta B.V.; Netherlands	A	1,250	7.50
GMNG Worldwide B.V.; Netherlands	A	1,250	7.50
Phobos B.V.; Netherlands	A	2,334	14.00
People Planet Profit II B.V.; Netherlands	A	2,167	13.00
Asociación de Pequeños Productores Bananeros "El Guabo" ¹	A	1,291	7.75
Total	A & B	16,667	100.00

¹ Located in Ecuador

AgroFair Producers Cooperative: All Fairtrade certified producer organisations supplying products to AgroFair can apply for membership of the CPAF after one year or one complete season of supply. The cooperative facilitates sharing knowledge and expertise among its members and represents them at the Assembly of Shareholders of AgroFair. Dividend distribution within the cooperative is based on the value of the fruit delivered to AgroFair. Voting power in the cooperative is based on the average fruit value per producer and a vote according to the 'one man one vote' principle. This approach aims to ensure democracy and to protect producers who supply smaller volumes.

Altromercato Impresa Sociale: Altromercato is the leading Fair trade company in Italy and one of the largest in the world. It is a cooperative, social enterprise with a membership of not-for-profit organisations and Fair trade shops all over Italy. Altromercato manages relationships with producer organisations in many countries.

Inversiones Viva: Inversiones Viva is an investment company that promotes a new, more sustainable development model in Latin America.

Benta, GMNG worldwide, Phobos and People Planet Profit: Benta, GMNG Worldwide, Phobos and People Planet Profit are Dutch investment companies with a pioneering vision. With their investments they strive to seek long term objectives that profit society as a whole.

'El Guabo' Asociación de Pequeños Productores Bananeros: El Guabo is an Ecuadorian association of small banana producers, whose bananas are produced in an environmentally, socially and economically sustainable manner under Fairtrade conditions. Over 100 banana producers are members of the association.

Tax Information – Country-by-Country Data

Information about the Group's activities by reference to the countries in which it operates is shown below:

Tax jurisdiction ¹	Names of tax resident entities	Primary activities
The Netherlands	Agro Fair Europe BV AgroFair Benelux BV AgroFair Innovations BV ² AgroFair Projects BV ² Hoge Snelheid 1 BV ² Hoge Snelheid 2 BV ² Hoge Snelheid 3 BV ²	Produce and import sustainable Fairtrade and organic bananas
Peru	Tulipan Naranja SAC	Co-ordinate and facilitate local activities

¹ Tax jurisdiction of each subsidiary is also equivalent to place of incorporation and location of registered office.

² Inactive subsidiaries dissolved during the year ended 31 December 2024.

Tax jurisdiction	No. of employees / workers	Third party / external turnover (€'000)	Intra-group turnover (€'000)	Net result after tax (€'000)	Current tax charge / (credit) (€'000) ¹	Cash taxes paid / (received) (€'000)
The Netherlands	22	85,971	100	1,713	587	523
Peru	10	1,167	1,728	(110)	(38)	(38)
Total	32	87,138	1,828	1,603	549	485

¹ Current tax charge is the same as total tax charge because the deferred tax charge/(credit) for the year is €nil. No deferred tax assets or liabilities are recognised on the balance sheet as at 31 December 2024.

Uncertain Tax Positions (“UTPs”)

The Group has no uncertain tax positions as at 31 December 2024.

This means that all adopted tax positions and tax treatments are deemed low risk, at least generally acceptable, and not likely to be challenged. Going forward, if and when a tax treatment becomes difficult to interpret, we will seek guidance from appropriate professionals and, where necessary, ensure our low risk approach is conveyed to them.

Related Party Transactions

The AgroFair Producers Cooperative owns part of the company. These producers are also the Group’s main suppliers. The transaction prices for these purchases are mainly governed by the minimum prices of Fairtrade International and for a smaller part by world market prices.

As at 31 December 2024, there existed outstanding amounts receivable from CTM-AgroFair Italia S.R.L. of €1,316k (2023: €845k). CTM-AgroFair Italia is a sales company located in Bolzano (Italy), in which the Group has a 50% stake.