Pernod Ricard

Société Anonyme

5, cours Paul Ricard

75008 Paris

Audit Report of one of the Statutory Auditors of Pernod Ricard S.A. on the Financial Statements of Pernod Ricard International Finance LLC

For the year ended June 30, 2024

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For the year ended June 30, 2024

To the Chief Executive Officer of Pernod Ricard S.A.,

Opinion

As statutory auditor of Pernod Ricard S.A. and for the purposes of the Euro 7,000,000,000 Euro Medium Term Note Programme of Pernod Ricard Group, we have audited the accompanying financial statements of Pernod Ricard International Finance LLC (the "**Company**"), a wholly-owned subsidiary of Pernod Ricard S.A., comprising a balance sheet as at June 30, 2024, as well as a statement of profit and loss, a statement of comprehensive income, a statement of changes in equity and a statement of cash flows for the year then ended, and notes to the financial statements containing a summary of the main accounting policies (the "**Financial Statements**").

In our opinion, the Financial Statements present fairly, in all material respects, the assets and liabilities and financial position of the Company as at June 30, 2024 and the results of its operations for the year ended June 30, 2024 in accordance with IFRS as adopted by the European Union.

Basis for Opinion

Audit Framework

We conducted our audit in accordance with professional standards applicable in France and the professional guidance issued by the French National Institute of Statutory Auditors (*Compagnie nationale des commissaires aux comptes*) relating to this engagement. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Our responsibilities under those standards are further described in the "*Statutory Auditor's Responsibilities for the Audit of the Financial Statements"* section of our report.

Independence

We conducted our audit in compliance with independence requirements of the French Commercial Code (*code de commerce*) and the French Code of Ethics (*code de déontologie*) for statutory auditors.

Responsibilities of Management and Those Charged with Governance for the Financial Statements

Management is responsible for the preparation and fair presentation of the Financial Statements in accordance with IFRS as adopted by the European Union, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the Financial Statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless it is expected to liquidate the Company or to cease operations.

These Financial Statements were prepared under the responsibility of the Board of Managers of the Company.

Statutory Auditor's Responsibilities for the Audit of the Financial Statements

Our role is to issue a report on the Financial Statements. Our objective is to obtain reasonable assurance about whether the Financial Statements as a whole are free from material misstatement. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with professional standards applicable in France and the professional guidance issued by the French National Institute of Statutory Auditors (*Compagnie nationale des commissaires aux comptes*) relating to this engagement will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Our audit of the Financial Statements does not include assurance on the viability of the Company or the quality of management of the affairs of the Company.

As part of an audit conducted in accordance with this standard and the professional guidance issued by the French National Institute of Statutory Auditors (*Compagnie nationale des commissaires aux comptes*) relating to this engagement, the statutory auditor exercises professional judgment throughout the audit and furthermore:

- identifies and assesses the risks of material misstatement of the Financial Statements, whether due to fraud or error, designs and performs audit procedures responsive to those risks, and obtains audit evidence considered to be sufficient and appropriate to provide a basis for the opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;

- obtains an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the internal control;

- evaluates the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management in the Financial Statements;

- assesses the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. This assessment is based on the audit evidence obtained up to the date of the audit report. However, future events or conditions may cause the Company to cease to continue as a going concern. If the statutory auditor concludes that a material uncertainty exists, there is a requirement to draw attention in the audit report to the related disclosures in the Financial Statements or, if such disclosures are not provided or inadequate, to modify the opinion expressed therein;

- evaluates the overall presentation of the Financial Statements and assesses whether these Financial Statements represent the underlying transactions and events in a manner that achieves fair presentation.

This report was prepared for your attention in the context described above and must not be used, distributed or referred to for any other purpose.

This report is governed by French law. The Courts of France have exclusive jurisdiction in relation to any claim, difference or dispute which may arise out of or in connection with our engagement letter or this report, or any related issues. Each party irrevocably waives any right it may have to object to an action being brought in any of those Courts, to claim that the action has been brought in an inconvenient forum or to claim that those Courts do not have jurisdiction.

Paris-La Défense, October 17, 2024

One of the Statutory Auditors

Deloitte & Associés

Loris STRAPPAZZON

PERNOD RICARD INTERNATIONAL FINANCE LLC

FINANCIAL STATEMENTS

FOR THE YEARS ENDED JUNE 30, 2024 AND 2023

2024

PERNOD RICARD INTERNATIONAL FINANCE LLC
BALANCE SHEETS

as at June 30, 2024 and 2023
(in thousands of USD)

As at	Notes		June 30, 2024		June 30, 2023
ASSETS					
Cash and cash equivalents		$	1,048	$	437
Income Taxes Recoverable			47	$	-
Deferred Tax Asset			32		24
Advances receivable from member	5		32,134		16,431
Total current assets			33,261		16,892
Promissory notes receivable	5		2,238,341		2,235,266
Total assets		$	2,271,602	$	2,252,158
EQUITY					
Share Capital	6	$	250,000	$	250,000
Retained earnings			38,106		20,887
Total member's equity			288,106		270,887
LIABILITIES					
Accrued liabilities	4	$	9,013	$	8,984
Income tax payable			-		5
Advances payable to affiliates	5		998		998
Total current liabilities			10,011		9,987
Bonds payable	8		1,973,485		1,971,284
Total liabilities			1,983,496		1,981,271
Total liabilities and member's equity		$	2,271,602	$	2,252,158

The accompanying notes are an integral part of these financial statements.

PERNOD RICARD INTERNATIONAL FINANCE LLC
STATEMENTS OF PROFIT AND LOSS

for the year ended June 30, 2024 and 2023
(in thousands of USD dollars)

	Notes	June 30, 2024	June 30, 2023
Interest income		$ 63,934	$ 56,998
Interest expense		(38,077)	(38,037)
Financial expenses		(3,990)	(3,990)
Administration expenses		(71)	(2)
Profit before income taxes		21,796	14,969
Current income taxes		(4,584)	(3,125)
Deferred income taxes		7	(2)
Income taxes		(4,577)	(3,127)
Profit for the period		$ 17,219	$ 11,842

The accompanying notes are an integral part of these financial statements.

PERNOD RICARD INTERNATIONAL FINANCE LLC
STATEMENTS OF COMPREHENSIVE INCOME

for the year ended June 30, 2024 and 2023
(in thousands of USD)

	Notes	June 30, 2024	June 30, 2023
Profit for the period		**$ 17,219**	**$ 11,842**
Other comprehensive Income:			
Amounts that will not be subsequently reclassified to earnings:		**$ -**	**$ -**
Total comprehensive income		**$ 17,219**	**$ 11,842**

STATEMENTS OF CHANGES IN EQUITY

for the year ended June 30, 2024 and 2023
(in thousands of USD dollars)

	Member's Capital	Total Comprehensive Income	Total
Balance as at June 30, 2023	$ 250,000	$ 20,887	$ 270,887
Profit for the period	-	17,219	17,219
Other comprehensive income	-	-	-
Increase in share capital	-	-	-
Balance as at June 30, 2024	**$ 250,000**	**$ 38,106**	**$ 288,106**
Balance as at June 30, 2022	$ 250,000	$ 9,045	$ 259,045
Profit for the period	-	11,842	11,842
Other comprehensive income	-	-	-
Increase in share capital	-	-	-
Balance as at June 30, 2023	**$ 250,000**	**$ 20,887**	**$ 270,887**

The accompanying notes are an integral part of these financial statements.

PERNOD RICARD INTERNATIONAL FINANCE LLC
STATEMENTS OF CASH FLOW

for the year ended June 30, 2024 and 2023
(in thousands of USD dollars)

	June 30, 2024	June 30, 2023
Operating activities		
Profit for the period	$ 17,219	$ 11,842
Adjustments for:		
Interest income	(63,934)	(56,998)
Interest expense	38,077	38,037
Income tax expense	4,577	3,127
	(4,061)	(3,992)
Net change in non-cash working capital balances	(14,284)	(9,331)
Income taxes paid	(4,636)	(3,123)
Net cash from operating activities	(22,981)	(16,446)
Financing activities		
Interest received from promissory notes receivable	59,468	52,617
Interest paid on bonds	(35,876)	(35,875)
Net cash used in financing activities	23,592	16,742
Net increase in cash	611	296
Cash, beginning of year	437	141
Cash, end of year	$ 1,048	$ 437

The accompanying notes are an integral part of these financial statements.

PERNOD RICARD INTERNATIONAL FINANCE LLC
NOTES TO THE FINANCIAL STATEMENTS

For the year ended June 30, 2024 and 2023
(in thousands of US dollars)

1. GENERAL INFORMATION

Pernod Ricard International Finance LLC ("PRIF" or the "Company") is a Delaware limited liability company organized on August 10, 2020 by filing a certificate of formation of the Company with the Secretary of State of the State of Delaware in accordance with the provisions of the Delaware Limited Liability Company Act. The Company's duration is perpetual. Pernod Ricard, S.A. ("PR SA") a French public limited company, is the ultimate parent company of Pernod Ricard International Finance.

The Company's registered address is 251 Little Falls Drive, Wilmington, Delaware.

The Company was formed as a special purpose financing company to raise funds in the capital markets or bank markets, including by means of issuance of Notes, to lend the proceeds thereof to subsidiaries of Pernod Ricard SA by way of inter-company loans. The Company has no independent business operations, no subsidiaries and no employees.

2. BASIS OF PREPARATION

Statement of Compliance
These individual financial statements have been prepared in accordance with International Financial Reporting Standards ("IFRS") as adopted by the European Union and using the accounting policies described herein.

These individual financial statements were approved by the Company's Board of Managers on September 27th, 2024

Functional and Presentation Currency
The Company's financial statements are presented in US dollars, which is the Company's functional currency.

Foreign Currency Translation
Transactions denominated in foreign currencies are translated into the functional currency using the exchange rate applying at the transaction date. Non-monetary assets and liabilities denominated in foreign currencies are recognized at the historical exchange rate applicable at the transaction date. Monetary assets and liabilities denominated in foreign currencies are translated at the exchange rate applying at the balance sheet date. Foreign currency differences are recognized in profit or loss for the period.

Use of Estimates and Judgements
The preparation of the financial statements in conformity with IFRS as adopted by the European Union, requires management to make certain judgments, estimates and assumptions that affect the application of accounting policies, the reported amounts of assets and liabilities, disclosure of contingent assets and liabilities at the date of the financial statements, and the reported amounts of income and expenses during the reporting period.

Judgment is commonly used in determining whether a balance or transaction should be recognized in the financial statements and estimates, and assumptions are more commonly used in determining the measurement of recognized transactions and balances. However, judgment and estimates are often interrelated.

Estimates and associated assumptions are based on historical experience and other factors that are relevant. Estimates are made on the assumption the Company will continue as a going concern and are based on information available at the time of preparation. Estimates may be revised where the circumstance on which they were based change or where new information becomes available. Future outcomes can differ from these estimates. Estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimates are revised and in any future periods affected.

Critical judgments, estimates, and assumptions that have a significant effect on the financial statements are disclosed, where applicable, in the relevant notes to the financial statements.

3. SIGNIFICANT ACCOUNTING POLICIES

The accounting policies set out below have been applied consistently in these financial statements.

Cash and cash equivalents
Cash and cash equivalents represent cash held on deposit with bank.

Financial Instruments
Financial assets and financial liabilities are recognized when the Company becomes a party to the contractual provisions of the instruments. Financial instruments are classified into one of the following categories: fair value through profit or loss, fair value through other comprehensive income, or amortized cost. The classification determines the accounting treatment of the instrument. The classification is determined by the Company when the financial instrument is initially recorded. For financial asset, classification is based on the financial instrument's cash flow characteristics and business model.

Financial assets and financial liabilities are classified and measured as follows:

Financial Asset/Liability	Category	Measurement
Advances receivable from member	Amortized cost	Amortized cost
Promissory notes receivable	Amortized cost	Amortized cost
Accrued liabilities	Amortized cost	Amortized cost
Bonds payable	Amortized cost	Amortized cost

<u>*Financial Assets*</u>

Financial assets measured at amortized cost are initially recognized at the fair value of the consideration given plus any directly attributable transaction costs and then, subsequently, at amortized cost using the effective interest method, less any impairment losses, with gains and losses recognized in profit or loss in the period in which the gain or loss occurs.

The effective interest rate is the rate that exactly discounts estimated future cash receipts, excluding credit losses, through the expected life of the debt instrument.

The amortized cost of a financial asset is the amount at which the financial asset is measured at initial recognition minus principal repayments, plus the cumulative amortization using the effective interest method of any differences between that initial amount and the maturity amount.

Interest income is recognized using the effective interest method for debt instruments. It is recognized in the profit or loss and included in “Interest income.”

All financial assets are recognized and derecognized on the trade date. A financial asset is derecognized when the contractual rights to the cash flows from the asset expired or when the Company transferred the financial asset to another party without retaining control or substantially all the risks and rewards of ownership of the asset. Any interest in transferred financial assets that is created or retained by the Company is recognized as a separate asset or liability.

Financial liabilities

Financial liabilities measured at amortized cost are initially recognized at the fair value of the consideration received less any directly attributable transaction costs and then, subsequently, at amortized cost using the effective interest method.

The effective interest rate is the rate that exactly discounts estimated future cash payments (including all fees and points paid or received that form an integral part of the effective interest rate, transaction costs and other premiums or discounts) through the expected life of the financial liability.

A financial liability is derecognized when its contractual obligations are discharged, cancelled or expire.

Impairment of financial assets at amortized cost

In accordance with IFRS 9, the Company records a loss allowance for expected credit losses on financial assets at amortized cost.

All impairment losses are recognized in profit or loss.

Corporate income tax
Income tax expense is recognized in profit or loss. Current income tax expense comprises the tax payable on the taxable income for the current financial year using tax rates enacted or substantively enacted at the reporting date, and any adjustment to income taxes payable in respect of previous years, if applicable.

4. FINANCIAL INSTRUMENTS

The Company’s financial instruments consist of the following balances:

Financial assets

	June 30, 2024	June 30, 2023
Advances receivable from member	$ 32,134	$ 16,431
Promissory notes receivable	2,238,341	2,235,266

Financial liabilities

	June 30, 2024	June 30, 2023
Accrued liabilities	$ 9,013	$ 8,984
Advances payable to affiliates	998	998
Bonds payable	1,973,485	1,971,284

Fair Value of Financial Instruments

The Company uses a fair value hierarchy in order to classify the fair value measurements and disclosures related to the Company's financial assets and financial liabilities.

The fair value hierarchy has the following levels:

- Level 1 – Quoted market prices in active markets for identical assets or liabilities;
- Level 2 – Inputs other than quoted market prices included in Level 1 that are observable for the asset or liability, either directly (as prices) or indirectly (derived from prices); and
- Level 3 – Unobservable inputs such as inputs for the asset or liability that are not based on observable market data.

For short term financial assets and liabilities that are valued at other than fair value on its balance sheets (i.e., advances receivable from affiliates and accrued liabilities and advances payable to affiliates), fair value approximates their carrying values at each balance sheet date due to their short-term maturities.

For variable rate long term promissory notes receivable, carrying value approximates fair value.

The following table shows the carrying amounts and fair value of promissory notes receivable. Fair values have been determined using level 2 inputs:

Fair value of fixed rate financial assets		**June 30, 2024**	**June 30, 2024**
	Maturity Date	**Carrying amount**	**Fair value**
Loan 250 Million USD	**October 1, 2035**	**254,436**	**254,436**
Loan 600 Million USD	**April 1, 2028**	**599,505**	**320,196**
Loan 900 Million USD	**April 1, 2031**	**896,262**	**722,876**
Loan 500 Million USD	**October 1, 2050**	**488,138**	**524,124**
		$ 2,238,341	**$ 1,821,632**

Fair value of fixed rate financial assets		June 30, 2023	June 30, 2023
	Maturity Date	Carrying amount	Fair value
Loan 250 Million USD	October 1, 2035	253,543	253,543
Loan 600 Million USD	April 1, 2028	598,793	506,626
Loan 900 Million USD	April 1, 2031	895,165	706,414
Loan 500 Million USD	October 1, 2050	487,765	340,285
		$ 2,235,266	$ 1,806,867

The following table shows the carrying amounts and fair values of fixed rate bonds payable. Fair values have been determined using level 2 inputs:

Fair value of fixed rate financial liabilities		**June 30, 2024**	**June 30, 2024**
	Maturity Date	**Carrying amount**	**Fair value**
Bond 600 Million USD	**April 1, 2028**	**597,285**	**522,404**
Bond 900 Million USD	**April 1, 2031**	**892,015**	**717,235**
Bond 500 Million USD	**October 1, 2050**	**484,185**	**308,304**
		$ 1,973,485	**$ 1,547,943**

Fair value of fixed rate financial liabilities		June 30, 2023	June 30, 2023
	Maturity Date	Carrying amount	Fair value
Bond 600 Million USD	April 1, 2028	596,584	508,529
Bond 900 Million USD	April 1, 2031	890,911	699,770
Bond 500 Million USD	October 1, 2050	483,789	328,153
		$ 1,971,284	$ 1,536,452

Financial Risk Management Objectives and Policies

PRIF is exposed to a number of market risks that have the potential to negatively impact its financial performance, including credit risk, liquidity risk and market risk. These risks are discussed in more detail below.

Credit Risk

Credit risk is the risk that a counterparty will default on its contractual obligations resulting in financial loss. Financial assets exposed to credit risk are advances receivables from affiliates and promissory notes receivable.

The carrying amounts of financial assets represent the maximum credit exposure.

The promissory notes receivable is due from Distilled Innovation AB (“DIAB”), a related party incorporated under the laws of Sweden. The promissory notes receivable are supported ultimately by a primary shareholder of DIAB via a subscription and credit support agreement. (further described in Note 5). This shareholder is a wholly owned subsidiary of PR SA, PRIF’s single shareholder.

PRIF’s credit risk associated with advances receivable and promissory notes receivable is contingent upon PR SA’s credit rating. PR SA’s credit rating as at June 30, 2024, as published by Standard & Poor’s and Moody’s, was BBB+ and Baa1, respectively. There has been no significant increase of credit risk since origination date of the advances and promissory notes receivable. Consequently, these balances are subject to a 12-month expected credit loss allowance. The resulting 12-month expected credit loss to be recognized in accordance with IFRS 9 is not material.

Liquidity Risk

Liquidity risk is the risk that the Company will encounter difficulty in meeting the obligations associated with its financial liabilities that are settled by delivering cash or another financial asset. The Company’s objective when managing liquidity is to ensure, as far as possible, that it will have sufficient liquidity to meet its liabilities when they are due, under both normal and stressed conditions, without incurring unacceptable losses or risking damage to the Company’s reputation.

The Company’s primary source of liquidity is interest received from DIAB on the promissory notes receivable. During the year ended June 30, 2024, the promissory notes receivable generated $62,544. The Company believes that interest income generated from its promissory notes receivable is more than sufficient to fund interest owing on its bonds payable, administration expenses and commitments for the foreseeable future.

The following table reflects PRIF’s remaining contractual obligations for its financial liabilities with contractual repayment periods using the undiscounted cash flows of financial liabilities based on the earliest date on which the Company can be required to pay, both interest and principal, when applicable. The Company's maturities at the reporting date are as follows:

		Less than 1 year		1 to 5 years		5 years and thereafter		June 30, 2024 Total
Accounts payable and accrued liabilities	$	9,013	$	-	$	-	$	9,013
Loans and advances to related parties and affiliates		998		-		-		998
Bonds payable		35,875		736,000		1,724,875		2,496,750
	$	**45,886**	**$**	**736,000**	**$**	**1,724,875**	**$**	**2,506,761**

		Less than 1 year		1 to 5 years		5 years and thereafter		June 30, 2023 Total
Accounts payable and accrued liabilities	$	8,984	$	-	$	-	$	8,984
Loans and advances to related parties and affiliates		998		-		-		998
Bonds payable		35,875		143,500		2,353,250		2,532,625
	$	**45,857**	**$**	**143,500**	**$**	**2,353,250**	**$**	**2,542,607**

Market risks

Market risk is the risk that changes in market prices – primarily interest rates – will affect the Company's income or the value of its holdings of financial instruments.

PRIF is a special purpose financing company which relies on payments from affiliated companies, subsidiaries of its primary shareholder PR SA., to provide it with funds to meet its obligations under the bonds payable. PRIF manages interest rate risk by ensuring proper matching of fixed rate assets with fixed rate liabilities. All financial and investment decisions are ultimately approved by the parent company, PR SA.

5. RELATED PARTY TRANSACTIONS

On October 1, 2020, Distilled Innovation AB ("DIAB"), a wholly owned subsidiary of PR SA, issued $2,215,486 promissory notes to PRIF (see Note 4). At June 30, 2024, the balances are as follows:

		Amount	Maturity Date	Accrued Interest	Rate		Total June 30, 2024
Loan 250 Million USD	$	**250,000**	**October 1, 2035**	**4,436**	**SOFR + 1.88%**	**$**	**254,436**
Loan 600 Million USD		**597,225**	**April 1, 2028**	**2,280**	**1.650%**	**$**	**599,505**
Loan 900 Million USD		**891,976**	**April 1, 2031**	**4,286**	**2.047%**	**$**	**896,262**
Loan 500 Million USD		**484,238**	**October 1, 2050**	**3,900**	**3.300%**	**$**	**488,138**
						$	**2,238,341**

During the year ended June 30, 2024, PRIF earned interest income of $62,544 on the promissory notes receivable.

The promissory notes receivable are secured through a subscription and credit support agreement provided by Pernod Ricard USA Finance, Inc. ("PRUF"), a Delaware corporation and owner of all the shares of DIAB, and Austin, Nichols & Co., Incorporated ("ANCO") a Delaware corporation and indirect owner of all the shares of PRUF and DIAB, whereby PRUF and ANCO will provide necessary capital if DIAB is unable to comply with any payment obligation under the promissory notes. PRUF and ANCO are wholly owned subsidiaries of PR SA.

In addition to the above transaction, PR SA has provided a guarantee of bonds payable. During the year, PRIF paid guarantee fees to PR SA of $3,990.

Other than the promissory notes receivable, balances outstanding with affiliates are due within 60 days, are to be settled in cash and are unsecured.

	June 30, 2024	June 30, 2023
Advances receivable from member	$ 32,134	$ 16,431
Loans and advances payable to affiliated companies	$ 998	$ 998

6. CAPITAL MANAGEMENT

The Company's primary objective when managing capital is to ensure sufficient capital exists to support cash requirements of bonds payable.

Shareholder's capital includes the following:

	June 30, 2024	June 30, 2023
Member capital	$ 250,000	$ 250,000
Accumulated other comprehensive income	-	-
Retained earnings	38,106	20,887
Net capital under management	$ 288,106	$ 270,887

7. ACCRUED LIABILITIES

	June 30, 2024	June 30, 2023
Accrued interest on bonds payable	$ 8,969	$ 8,969
Other accrued liabilities	44	15
Accrued liabilities	$ 9,013	$ 8,984

8. BONDS PAYABLE

	Maturity Date	Rate	Bond Payable
Bond 600 Million USD Issued October 1, 2020	April 1, 2028	1.250%	$ 597,285
Bond 900 Million USD Issued October 1, 2020	April 1, 2031	1.625%	892,015
Bond 500 MillionUSD Issued October 1, 2020	October 1, 2050	2.750%	484,185
			$ 1,973,485

Interest is paid bi-annually each April 1st and October 1st. Interest not yet paid and accrued on the bonds payable is recorded in accrued liabilities and amounted to $8,969 at June 30, 2024.

9. INCOME TAXES

For the year-end June 30, 2024, the effective tax rate approximates the statutory taxation rate of 21% (2023 – 21%).