

**Tax Strategy** 



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# **Graphmars Topco Limited and Subsidiary Companies**

## **Tax Strategy**

This Tax Strategy applies to Graphmars Topco Limited and its UK subsidiaries. The Group is committed to conducting its UK tax affairs in a responsible and compliant manner and to paying the right amount of tax at the right time (following all applicable laws, rules and regulations) with complete transparency.

The publication of this Tax Strategy is regarded as satisfying the statutory obligation under Schedule 19 of the Finance Act 2016. It has been approved by the Board of Directors of Graphmars Topco Limited and is effective for its accounting period ending 31 December 2024.

# Governance arrangements in relation to UK taxation

Ultimate responsibility for tax strategy and compliance rests with the Board of Directors of Graphmars Topco Limited, which ensures that the appropriate framework is in place to oversee the identification and management of tax risk.

The Chief Financial Officer (CFO) is the Board member with executive responsibility for tax matters. He is the UK Senior Accounting Officer (SAO). He participates in all material tax related decisions. Day-to-day management of tax affairs is delegated to the team headed by the Group Finance Director (including Finance Managers who prepare VAT returns and the Corporate Accounting and Tax Manager who oversees corporation tax) and the payroll department (which deals with payroll taxes).

External advisors are engaged when it is considered appropriate, for example, to ensure the Group pays the right amount of tax in relation to significant transactions, or where there is uncertainty in the interpretation of tax legislation.

The Board of Directors is briefed and consulted on the Group's key tax affairs as required.

# The approach of the Group to risk management and the level of risk in relation to UK taxation that the Group is prepared to accept.

Given the scale of the business and its different operational businesses and the range of taxes that the group has to account for, risks inevitably arise from time to time in relation to the interpretation of tax law and the nature of our compliance arrangements.

The Group has a low risk appetite and as above, the Group aims to be compliant with all tax obligations. As such, it does not operate specific thresholds for acceptable tax risk.

The Group seeks to identify, evaluate, monitor and manage these risks to ensure they remain in line with the Group's overall objectives. Where there is significant uncertainty or complexity, external professional advisors will be engaged.

The Group does not tolerate tax evasion or the facilitation of tax evasion.

The CFO has overall responsibility for tax at the Board level and advises the Board on the tax position and risks of the Group. This is to ensure the proper control and management of tax risk, the management of the group tax position, and the statement of the correct tax charge in the statutory accounts and tax returns.

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#### The attitude of the Group towards UK tax planning

The Group is committed to ensuring that all commercial transactions and planning opportunities are structured in a tax-compliant manner, whilst taking account of all available reliefs and allowances permitted by law which may minimise tax cost. The Group will not enter into transactions that have no commercial purpose or are contrived, artificial or are knowingly contradictory to the intention of Parliament. It thus does not engage in contrived or artificial tax arrangements where the sole purpose is to reduce tax.

The use of external advisors is assessed by the CFO and is focused on providing both technical and commercially relevant advice and guidance to the Group as a whole.

### The approach of the Group towards its dealings with HMRC

The Group is committed to establishing cooperative, professional and transparent relationships with HMRC. The CFO keeps in regular touch with our Customer Compliance Manager (CCM) to maintain a mutually beneficial relationship. Full, open and early dialogue is maintained to discuss, as appropriate, tax planning, strategy, risks and key transactions.

In the event of any identified error(s) arising, full disclosure, where required by law, will be made.

The Group deals with all correspondence in a timely manner, and answers in an open way with a full response to any inquires.

Advance tax clearance of key transactions will be obtained where tax treatment is uncertain and a tax clearance procedure is available.

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