



GMK LTD – TAX STRATEGY

Established in 1971, GMK Limited ("GMK") is the leading UK importer and distributor of shotguns, rifles, ammunition, and accessories for sports shooting, as well as supplying firearms, ammunition and accessories to UK law enforcement and the Ministry of Defence. GMK's objective is to offer the leading range of quality products for the country sports as well as other markets where there is a demand for these products. GMK Ltd is also involved in the worldwide distribution of distraction devices for Centanex products.

This statement is prepared in accordance with the requirements of Paragraph 19, Schedule 19 of the Finance Act 2016 and is in relation to the financial year ended 31 December 2022. This tax strategy applies to GMK and its UK subsidiaries including: Gunco11 Limited, Gunmark Limited, Centanex Limited and Holland & Holland Limited.

This document, approved by the Board, sets out the Group's approach to conducting its tax affairs and dealing with tax risks.

Tax risk management

The Group is committed to paying the right amount of UK tax at the right time in the right place. This is ensured by having tax accounting procedures and internal controls in place. The Group ensures timely filing of all relevant tax returns and timely payments of all tax liabilities.

Our approach is governed by a Board approved governance framework, under which the Finance Director is responsible for overall management of our tax affairs, with delegated authority from the Board. The Finance Director oversees a well-resourced Finance Team, each of whom have clearly assigned tax-related responsibilities. All members of the team are appropriately qualified to perform their role. In addition, they each have a strong understanding of the overall business operations to ensure the completeness and accuracy of information in all relevant tax filings.

We ensure tax compliance is approached with a high degree of integrity. Tax risk is managed by having clear responsibilities, controls, processes and clear reporting lines. We comply with the letter and spirit of the law and ensure that returns and payments are made on time and full disclosure is made to the tax authorities. We properly reflect tax considerations in our commercial business activities.

Tax planning

GMK aim to comply with all tax rules and regulations, and do not get involved in tax planning which does not support genuine commercial activity. GMK has a low-risk appetite for tax risks.

Transactions between group companies are carried out on an arm's length basis. Professional opinions are sought from reputable independent external advisers on any matters where the tax treatment may be contentious or uncertain.

Approach to dealing with HMRC

GMK is open, transparent, and collaborative in its dealings with HMRC. We take a pro-active approach and where appropriate will seek advance clearance from HMRC. We will always seek to resolve any disputed matters through active and transparent communication.