

# Gray & Adams Holdings Ltd – Tax Strategy for the period ending 1<sup>st</sup> May 2026

## Scope

This UK tax strategy applies to Gray & Adams Holdings Limited and all of its subsidiaries, which together make up the Gray & Adams Group (herein referred to as 'the Group').

Gray & Adams is the UK market-leader in the manufacture of specialist temperature controlled and bespoke vehicles. Founded in 1957, we are a long-established, family-owned business, based out of a head office and main production facility in Fraserburgh, Aberdeenshire and have operational sites across the UK in Doncaster, Dunfermline and Newtownabbey (NI). For over 65 years, our expert teams have been the key to our success, designing and building exceptional products that are well engineered and of a supreme build quality. As a result, we have a rich history of innovation and a product range which includes refrigerated and dry freight double deck trailers, supermarket trailers, rigid bodies, static cold stores, pharmaceutical trailers, game larders and custodial vehicles.

This strategy is published in accordance with para 16(2), Schedule 19, Finance Act 2016 relating to the financial period ending 1<sup>st</sup> May 2026 and applies from the date of publication until it is superseded.

## Aim

Taxation is a complex and technical discipline requiring significant expertise to ensure that the Group pay the right amount of tax, taking full account of the rules which governments set on behalf of society and which determine how wealth is redistributed. The Group believes that the interests of all its stakeholders are best served by ensuring that the Group acts responsibly in paying the right amount of tax, and paying this on time, whilst remaining financially strong to meet the needs of its customers.

The management of the Group is aligned to these fundamental principles and approach to taxation and overall high standards of governance operating within the Gray & Adams Group.

Documenting this UK Tax Strategy provides direction and control over the UK tax activity of the Group; it is followed consistently across the Group, with clear lines of responsibility and accountability.

## Risk Management & Governance in relation to UK taxation

### *Risk Management*

Ultimate responsibility for ensuring that the Group's UK tax affairs are conducted in accordance with this UK Tax Strategy rests with the Board of Gray & Adams Holdings Limited ('the Board').

The Board ensures that relevant qualified and trained staff are employed within the teams responsible for all the taxes the is dealt with. The services of third-party tax experts to support assurance in respect of overall tax compliance, as well as assisting in the more technically demanding elements of the tax compliance framework.

### *Systems and Controls*

All applicable UK laws, rules and regulations are observed, and diligent professional care and judgement is applied in arriving at any conclusions and assessment of uncertain tax positions.

Each company forming part of the Group operates appropriate systems, controls and processes to manage taxes effectively. Processes are regularly reviewed to ensure they remain robust and compliant.

Wherever possible, risks of errors are mitigated by having segregation of duties, for example, segregating the preparation and review of VAT returns.

## **Attitude towards tax planning**

All transactions are aligned with the commercial and economic activity of each subsidiary company's operations. We conduct our tax affairs in line with our desire to achieve certainty and maintain our good reputation with HMRC.

The Group seeks to reduce the level of tax risk arising from its operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations.

## **Attitude to tax risk**

The Group manages tax risks to ensure compliance within the legal requirements in a manner which ensures payment of the right amount of tax at the right time.

When entering into commercial transactions, the Group seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation. The Group does not undertake tax planning unrelated to such commercial transactions.

Consideration is always given to the Group's long-standing reputation, brand and corporate responsibilities when considering tax risk and/or initiatives. The Group seeks to be regarded by the relevant authorities as a low-risk taxpayer and as such The Board seek to be risk adverse, and wherever possible look to minimise risk in a professional and conscious manner.

Where the tax impact of a transaction is complex or where the relevant tax legislation is unclear, the Group will seek external third-party advice to ensure that the tax position adopted is expected to be acceptable to HMRC.

## **Relationship with HMRC**

The Group strives to have a transparent and constructive working relationship with HMRC.

The Group ensures that HMRC is kept aware of significant transactions and changes in the business and seeks to discuss any tax issues arising at an early stage either through direct communication or via the Group's tax advisors.

When submitting tax computations and returns to HMRC, the Group discloses all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain.

Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.

*This UK Tax Strategy was originally approved by the Board of Gray & Adams Holdings Limited on the 9<sup>th</sup> of February 2026 for and on behalf of the Group.*