

# Generac Holdings UK Limited

## Tax Strategy

December 2021

### Management and Governance of the Tax Function

Management at Generac Holdings UK Limited and the UK subsidiaries within the UK filing sub-group (Generac UK) regard the publication of this document as complying with the requirements set out in Part 2 of Schedule 19 to FA 2016. This document outlines the Company's approach to tax planning, management of tax risk and interactions with the UK tax authorities (Her Majesty's Revenue & Customs, HMRC) and has been reviewed and approved by senior management at the ultimate parent, Generac Holdings Inc. (Generac).

Management at Generac has established guidelines and expectations for all employees through the Corporate Governance Guidelines and Principles, The Code of Ethics and Business Conduct and the Supplemental Code of Ethics and Business Conduct (collectively, the Code). The Code is available to all of its employees through the Company's intranet page. The Code governs all activities of our employees including the management of tax. All employees are expected to follow the Code, conducting themselves with the highest standards of ethical behavior in all aspects of their work. Failure to abide by the Code or other Generac policies may result in disciplinary action, up to and including termination.

In identifying and managing UK tax risk, Generac's senior management relies upon Generac UK's operational and functional management teams to detect and quantify risks. Material risks identified are evaluated by Generac's senior management who determine if additional actions are needed to eliminate or mitigate the risk. If the identified risks are deemed material, management will raise these risks with the Generac Board of Directors and provide plans for managing these risks.

In meeting our obligations to the various taxing jurisdictions, our shareholders and our investors, Generac UK strives to:

- Conduct the Company's tax activities in a professional and ethical manner consistent with those stated in the Code.
- Comply with local tax filing requirements in each jurisdiction in which we do business.
- Regularly examine our business activity against existing tax laws making necessary changes to meet our obligations.
- Review newly enacted tax laws against our existing business activity making necessary changes to meet our obligations.
- Review material tax return positions, with the objective of understanding the underlying business activity and employing appropriate professional care and judgement to arrive at a well-reasoned conclusion regarding the appropriate tax treatment.
- Manage the Company's tax position, ensuring the tax obligations are commensurate with its activities and verify the Company is not overpaying its tax obligation to the detriment of our shareholders.
- Support the business activities of the Company and communicate the tax consequences of the various options available.

## **UK Tax Planning**

The Company approaches tax planning with a similar approach to those used in making any business decision. Tax planning and evaluation of transaction risks will be conducted with the following objectives:

- The business needs of the Company are at the forefront of tax planning actions.
- We do not pursue contrived or artificial arrangements solely for tax purposes.
- All tax planning activities will include a thorough review of the local tax laws ensuring the Company has taken a well-reasoned and defensible position.
- Should the local tax laws be unclear or if the application of those rules is uncertain when evaluated against a specific transaction, we may seek advice from a local tax professional.

## **Management of UK Tax Risk**

Management at Generac UK recognizes that interpreting and applying tax laws and regulations carries an element of risk where any position may be challenged by a taxing authority. In evaluating the Company's tax risk, Management understands that:

- Significant business and tax acumen will be necessary when applying tax law to a specific transaction.
- Business transactions do not always fall precisely into existing tax law, meaning judgment and interpretation are often times required.
- When a transaction is technical, unusual or material, the Company will research the specific characteristics of the transaction and applicable tax laws to determine the appropriate tax treatment.
- When the issue in question is technical, unusual or material, Management may seek guidance from a local tax advisor who will be more familiar with how the taxing authorities may apply the tax law to the specific transaction.
- Members of Generac's Management regularly meet with the Board of Directors and discuss significant tax projects that may be contemplated.

## **Approach with HMRC**

In our interactions and dealing with HMRC, the Company is committed to:

- Providing appropriate documentation in response to an HMRC query which is relevant to the specific transaction(s).
  - Approach HMRC with open and transparent lines of communication.
  - Treating the representatives from HMRC with respect and we expect similar treatment in return.
  - Working with HMRC to resolve a dispute in a professional manner.
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