

Fair Tax Policy

Fair Tax Mark Statement for Make Architects

This statement of Fair Tax compliance was compiled in partnership with the <u>Fair Tax Foundation</u> ("FTF") and certifies that Make Limited and its subsidiaries ('we', 'our', or 'us') meet the standards and requirements of the FTF's Global Multinational Business Standard for the Fair Tax Mark certification for the year ended 31 December 2023.

Tax policy

Our tax policy is to always operate within both the letter and spirit of all the tax laws that apply to our operations. Therefore, we don't use artificial tax avoidance schemes or tax havens to reduce our tax liabilities.

We're committed to paying all the taxes that we owe in accordance with the spirit of all tax laws that apply to our operations. We believe that paying our taxes in this way is the clearest indication we can give of being responsible participants in society. We will fulfil our commitment to paying the appropriate taxes that we owe by seeking to pay the right amount of tax, in the right place and at the right time. We aim to do this by ensuring that we report our tax affairs in ways that reflect the true economic reality of the transactions that we undertake during the course of our trade.

We will never seek to use those options made available in tax law (or the allowances and reliefs that it provides) in ways that are contrary to the spirit of the law. Nor will we undertake specific transactions with the aim of securing tax advantages that would otherwise not be available to us based on the reality of the trade that we undertake. We don't use artificial structuring to gain an artificial tax benefit. We only use business structures that are driven by commercial considerations, aligned with business activity and which have genuine substance.



All intercompany transactions are at arm's length and in line with industry norms; we would never abuse the use of so-called 'secrecy jurisdictions' or tax havens to avoid taxes. Each jurisdiction that we have a presence in is underpinned by legitimate commercial activity.

Our financial statements and tax filings will be prepared in compliance with this tax policy, and we will always be open, honest and transparent with tax authorities.

Our board of directors shall be responsible for overseeing the application of this policy and can confirm that it has been complied with for the year ended 31 December 2023.



Public country-by-country reporting

The country-by-country disclosure below shows our economic footprint across all jurisdictions that we operated in for the year ended 31 December 2023.

| | | | | Profit/(loss) | Current tax | Total tax | Cash taxes | | Employee | |
|---------------------------|--|--|------------|---------------|-----------------|-----------------|-----------------|------------------|------------|------------|
| Tax jurisdiction | Name of resident entities | Purpose of entity / principle activities | Revenues | before tax | charge/(credit) | charge/(credit) | paid/(received) | No. of employees | costs | Net assets |
| UK | Make Limited | Architectural and design services | 14,033,610 | (1,089,796) | (256,320) | (344,133) | (352,880) | 140 | 10,807,096 | 8,133,923 |
| | Make Architects Limited | Dormant | - | - | - | - | - | - | - | - |
| | Make Places Limited | Dormant | - | - | - | - | - | - | - | - |
| | One Make Limited | Dormant | - | - | - | - | - | - | - | - |
| | | | 14,033,610 | (1,089,796) | (256,320) | (344,133) | (352,880) | 140 | 10,807,096 | 8,133,923 |
| China | Make Architectural Design Consultancy (Beijing) Ltd | Dormant | _ | 5,210 | 1,225 | _ | | | | 37,833 |
| | , , , , , | | | 16,007 | 3.765 | 169 | - | 2 | 160.054 | |
| | Make Architectural Design Consultancy (Shanghai) Limited | Architectural and design services | - | • | | | | 2 | | |
| | | | - | 21,217 | 4,990 | 169 | - | | 160,954 | 85,982 |
| Hong Kong | Make (HK) Limited | Architectural and design services | 2,276,209 | (286,551) | (67,397) | (23,524) | - | 5 | 664,382 | 240,451 |
| Australia | Make Limited - overseas Australian branch | Architectural and design services | 1,629,674 | (499,901) | (117,577) | - | - | 18 | 1,180,104 | (498,290) |
| | | | 17,939,492 | (1,855,031) | (436,303) | (367,488) | (352,880) | 165 | 12,812,536 | 7,962,066 |
| Consolidation adjustments | | | 380,630 | 391,837 | 92,339 | - | - | | | (260,679) |
| Balance per the accounts | | | 18,320,123 | (1,463,193) | (343,964) | (367,488) | (352,880) | 165 | 12,812,536 | 7,701,388 |



Additional narrative disclosures

The country-by-country table above shows that we've made a loss in each jurisdiction except for China in which we made small profits.

In February 2024 Make Architectural Design Consultancy (Beijing) Ltd was deregistered.

The main reason for our current tax credit position in 2023 was due to claiming Research & Development (R&D) relief on qualifying spend. R&D tax reliefs support companies that work on innovative projects in science and technology. It can be claimed by a range of companies that seek to research or develop an advancement in their field. Some of our R&D activities related to improving façade porosity, net-zero carbon structural systems and integrating grade listed buildings. For the year ended 31 December 2023, we were classed as an SME (Small and Medium-sized Enterprise) for R&D tax relief. This meant we could claim additional tax relief on our qualifying expenditure and claim a repayable tax credit for the period.

With regards to our deferred taxes, for the year ended 31 December 2023, these all related to accelerated capital allowances. Accelerated capital allowances are a timing difference between how fixed assets are treated in our accounts and how they are treated for tax purposes. For accounting purposes, fixed assets should be depreciated over their useful economic lives. For tax purposes, there are specific rules to what can be claimed depending on the type of asset. As at 31 December 2023, we hadn't claimed as much tax relief on our assets than we could have, which is why we have a deferred tax asset to utilise going forward. These deferred taxes are a timing difference that will unwind over the useful economic lives of the assets that they relate to. This means that, eventually, the accumulated depreciation charged in our accounts and the corresponding overall tax relief claimed will equal one another.

For the year ended 31 December 2023, we had no transactions with any related parties that didn't form part of the consolidated group. We also had no tax uncertainties for the year ended 31 December 2023 and therefore have not made any uncertain tax provisions in our accounts.