



Sumo Group Limited

Group Tax Strategy

Introduction

Sumo Group Limited is publishing this tax strategy for the financial year ending 31 December 2023, pursuant to section 161 and section 22(2) of Schedule 19 of the UK Finance Act of 2016. This tax strategy applies to Sumo Group Limited and all its UK subsidiaries, referred to collectively in this document as “Sumo”, the “Group” or “we”.

The four Pillars of Sumo are Family, Security, Trust and Collaboration. Adequate and effective risk management, tax strategy and an internal control systems are key to safeguarding our strategic objectives.

At Sumo we do our utmost to meet all legal and tax requirements and disclose all relevant information to meet our responsibilities related to tax laws and regulations in all the jurisdictions in which we operate, including the UK.

A significant number of members in the UK Finance team hold qualifications from internationally recognized accounting and tax bodies. Members of such bodies are required to keep up to date with the latest accounting rules and tax legislation.

Tax Strategy

Tax legislation and policies are subject to change and we aim to monitor these changes to ensure we are in compliance with current tax guidance and rules and to minimise tax risk. We also cooperate with UK policy makers and UK trade bodies to discuss upcoming tax changes impacting the video games industry.

Our tax planning is designed to ensure compliance with all applicable tax policies and to reflect the business activities undertaken in all of our markets including the UK.

We will hold ourselves accountable to the following tax strategy:

- Comply with all applicable tax and legal requirements in the countries that we operate in. This includes the UK Criminal Finances Act and legislation related to Corporate Criminal Offences.
- Make sure our tax reporting and filings are completed in accordance with local requirements and with full transparency.
- Establish, maintain and comply with the Group’s internal tax policies, tax risk management and internal control guidelines.
- Ensure our tax liabilities are calculated correctly and paid on time.
- Maintain an honest and cooperative relationship with tax authorities in all countries and jurisdictions that we operate in.



Tax Risk Management

While tax risk cannot be entirely eliminated, we aim to minimise it as much as possible. Sumo is committed to complying with all tax laws and regulations wherever we operate. We regularly monitor changes in tax laws and have internal review policies and processes to ensure compliance.

Tax Risk at Sumo is managed in the following ways:

- We monitor tax updates and engage reputable independent external tax advisors to help us with this process and advise on any relevant tax issues and compliance.
- We have developed and seek to continually improve our Tax Risk Register.
- Tax risks are included in the Group's overall Risk Register which is reviewed periodically by senior management.
- Tax matters are discussed with senior management as needed.
- When making strategic acquisitions, we perform tax due diligence procedures with the support of external advisors to identify and address any tax risks.

Several members of our Finance team are focused on tax in their daily roles, and we also work with external tax advisors as mentioned above. We assess our requirements for tax expertise needed both internally and from external collaborators on an ongoing basis, in line with current business needs.

Business attitude to tax planning

We structure transactions based on sound commercial purposes, to give a tax result which reflects the business activities undertaken and which is consistent with applicable tax legislation.

How we work with HMRC

Sumo maintains an open and collaborative professional relationship with HMRC and any other tax authorities in the jurisdictions we operate in. We aim to respond to any tax queries on a timely basis and in a transparent manner.