



GLOBAL TAX POLICY

SGL GROUP

November 2023

» EXECUTIVE SUMMARY

At SGL Group we acknowledge that tax practice is an important part of society and equally an important part of responsible corporate citizenship. SGL Group have operational companies across Europe, Asia, Africa and America, all of which where direct and indirect tax payments are key sources to Government income enabling Governments to finance public services and infrastructure.

We support the international tax reform work by international organisations such as the OECD. With this tax policy we provide information to our stakeholders, investors, employees, civil society and the general public about our approach to tax in a transparent, compliant and responsible manner.

Our primary objective is to be tax compliant and live up to our social responsibility. The aim is to be transparent in reporting tax matters and meet public need for information, and at the same time consider the need for confidentiality regarding business critical information.

The SGL Group tax policy is approved by SGL Group 's board of Directors and applies to all SGL Group's companies wherever incorporated; covering SGL Group globally, including all regions EMEA, Asia, Pacific, North America and Latin America. The policy is reviewed by the Board of Directors annually.

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» 1 - INTRODUCTION AND INTEGRITY

The aim of our tax policy is to reflect and support our business by ensuring a sustainable tax rate, mitigating tax risks and complying with rules and regulations in the jurisdictions in which we operate.

The principles of our tax policy apply to the parent company SGL Group ApS and all of its subsidiaries ("SGL Group" / "the Group"). The principles are embedded in international operational guidelines and in processes established to ensure that the policy is adhered to in SGL Group's daily operations.

At SGL Group, we are committed to conducting ourselves ethically in everything that we do. For us, integrity means being honest and having strong moral principles. Integrity is embedded in our history and forms a cornerstone of SGL Group's way of doing business. Every individual in the Group is expected to act with the highest level of integrity when engaging with those inside or outside the Group and all employees in the Group shall comply with relevant laws.

In all tax matters we apply the same values and integrity by making sure that our primary focus is the ordinary operation of the Group, and in all the countries where we do business, we comply with all relevant tax laws as well as international regulations and practices including OECD guidelines.

» 2 – SUSTAINABLE FUTURE

SGL Group's tax policy directly contributes to achieving the UN's Sustainable Development Goals (SDGs) number 16 and number 17



The distribution of funds from SGL Group's tax payments is entirely managed by local governing bodies, which means that our contribution to SDG targets in respect of taxes is indirect and mostly relevant whenever investment (funded by taxes) is required. SGL Group pays indirect and direct taxes in the countries in which the Group operates where profits are generated.

SGL Group is committed to being a responsible taxpayer and avoid aggressive tax planning. The tax planning of the Group is to support the business activities in the Group, locally as well as Globally by ensuring that, wherever possible, the Group is not subject to double taxation still meeting national and international tax legislation.

» 3 - TAX GOVERNANCE AND CONTROLS

SGL Group acknowledges that international tax matters are increasingly complex, and we are committed to assigning the necessary resources to ensure compliance with relevant tax laws and regulations, including timely filing of tax returns and tax payments.

We do not adopt tax positions which are not defensible under full disclosure. We seek advice from external tax advisors in situations where restructuring, transactions or interpretation of tax legislation is outside the expertise existing within the Group.

We have a clear and transparent corporate structure driven by commercial considerations with no contrived entities or structures. The Group structure is highly based on local presence in countries throughout the world independently from obtaining tax incentives. Subsidiaries are generally owned by Scan Global Logistics A/S, Denmark or Transgroup Global Inc, USA, and cross border ownership inherited as part of acquisitions are wound up if they do not serve a commercial purpose.

We will not undertake transactions whose main purpose is to create a tax benefit which was not the intention of the relevant tax rule.

Through our Whistle Blower Hotline, we provide opportunities for employees and external parties to raise any issues of concern in person or anonymously.

» 4 - TRANSFER PRICING

SGL Group is a global corporation doing business with significant local presence, but importantly also an international business making use of Group services.

As a result, there are many cross-border transactions between SGL Group companies operating different tax regimes. The transfer pricing policy for these transactions is driven by the activities undertaken and the value created in each part of our businesses on arms-length basis in line with the OECD Transfer Pricing Guidelines; however also taking into account the tax impact from prior and future investments as well as prior year tax losses and incentives.

SGL Group consider the transfer pricing regulation equally important in all countries in which we operate and is aligned with our social responsibility. At the same time, we must maintain the right balance between international and local tax requirements to minimize the risk of transfer pricing adjustments and double taxation within the Group.

The key component in our profit allocation is our transfer pricing setup and methods in which we are committed to the principle of paying tax where value is created and we avoid transactions that artificially shift profits to low or no-tax locations without business activities.

We have implemented transfer pricing documentation to support the transfer pricing methods applied and supports the recommendations from EU and OECD frameworks and mandatory disclosures under DAC6. Further SGL Group will be in scope for Pillar II reporting.

» 5 - TAX INCENTIVES

Tax incentives are government measures that are intended to influence business decision-making or to encourage businesses to invest in a particular way by reducing the amount of tax they have to pay.

A number of the territories, in which we operate, offer incentives of various kinds and we seek to use these incentives where they are aligned with our business and operational objectives in a manner intended by the local Governments.

No tax optimization initiatives considered to impose a tax adjustment risk material to SGL Group are implemented without involvement of Management.

» 6 - ROLES AND RESPONSIBILITIES

The Board of Directors has the overall responsibility for the tax policy and compliance with tax legislation.

Daily responsibility of tax risk management lies with the Global CFO, supported by the Group Finance, Group Tax as well as Group Treasury and is overseen by the Audit committee.

Local management is responsible for tax compliance in the subsidiaries. Group Finance, Group Tax, Group Treasury as well as local management monitor new legislation and changes to existing legislation to assess the potential impact on the Group.

Last approved by the Board of Directors, 17 November 2023