



Tax Policy

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Objective

Tax policy is one of the key issues that receives attention from outsiders that can affect the Company's reputation, and, as the leader of the Group, it has attracted attention from the tax authorities that regulate the various taxes involved. This tax policy ensures that the Company strictly adheres to the principles of tax law with effective control, transparency, and systematic management of tax risks, including accurate and fair tax payments.

Definitions

Market Price	refers to the price of compensation, service fees, or interest, which shall be determined by the parties who are independent of each other in good faith in trade. The independent parties shall determine in good faith in trade. In the case of transfer of property, services, or loans that has the same type on the date of transfer of property, services, or loans.
Tax Authority	refers to a government agency authorized by law to assess, collect, and collect taxes and duties.
Tax Evasion	refers to illegal attempts to reduce the tax burden by using fraudulent means to evade or destroy tax laws.
Transfer Pricing	refers to the pricing of goods and services for transactions between related juristic persons based on the concept of market pricing.

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Policy Approach

1. Tax Practices

- a) The Company acknowledges its responsibility as a good taxpayer and is committed to complying with tax regulations to ensure that all taxes are correctly paid when they are due and in accordance with applicable tax laws.
- b) The Company and all its employees adhere to transparency and will not be involved in or assist in illegal tax evasion under any circumstances, either for the benefit of the Company or any other person.
- c) All transactions among companies of the Group shall be in accordance with the principles of market pricing and transfer pricing rules.
- d) Each department is responsible for ensuring the accuracy of the taxes associated with its transactions.
- e) The relevant departments are obliged to retain tax and accounting information for the period specified by law, as well as to be able to deliver it immediately upon request from the tax authorities.

2. Tax Risk Management


- a) Take into account the organization's business strategy and use it to determine tax optimization practices.
- b) Each tax optimization initiative must be supported by business facts based on the principles, content, significance of the model.
- c) If a tax risk or probability of tax audit is found, it must be notified to the accounting/tax department as soon as possible.

3. Tax Advisor

- a) The Company will seek the opinion of tax advisors to ensure that the Company's tax planning and operations are consistent with the organization's strategy and are not contrary to law.

4. Tax Structure

- a) The Company is aware of the risks in tax planning and pays attention to the analysis of tax structure to ensure that the Company does not commit tax evasion.
- b) The physical presence of the business is a factor in the consideration of the tax structure.

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c) The Company will comply with all applicable tax requirements and laws.

5. Operating Guidelines

a) The Company's operating guidelines shall be developed in accordance with the relevant legal requirements, both domestic and foreign established by the Company.

b) Performance guidelines shall be reviewed regularly as in line with applicable requirements and legislation.

Compliance and Consequences of Non-Compliance


The Company and its employees must fully comply with this policy and ensure that appropriate resources are available, and a review must be done regularly to ensure that the implementation and application of the policy remains effective at all times.

Failure to comply with the prescribed policy will lead to appropriate disciplinary action, including dismissal and/or legal action for damages arising from willful violation of the policy.

Policy Assessment

A review of policy quality will be conducted to assess the effectiveness and sustainability of the Group's and its subsidiaries' tax control frameworks.

Announced to be effective from December 8, 2023 onwards.



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Tax Policy Approver

Mr. Pisnu Pong-acha

Chairman of the Board of Director

