



Tax Responsibility Policy and Strategy

1. Purpose

This Tax Responsibility Policy establishes the principles governing the tax conduct of CENTUNION and its subsidiaries.

The company recognizes that responsible taxation is an essential component of corporate responsibility and sustainable development. Taxes constitute a key source of revenue for governments and contribute to the financing of public infrastructure, social services, and economic development.

The purpose of this policy is to ensure that the company conducts its tax affairs in a transparent, responsible, and compliant manner consistent with international best practices and the company's ethical standards.

2. Scope

This policy applies to CENTUNION, its subsidiaries, branches, project entities, and joint ventures in which the company participates.

The policy covers all tax-related matters including corporate income tax, value-added tax and indirect taxes, payroll taxes and social security contributions, customs duties, withholding taxes, and other fiscal obligations in all jurisdictions where the company operates.

3. Tax Responsibility Principles

3.1 Compliance with Laws and Regulations

The company complies with all applicable tax laws and regulations in every jurisdiction in which it operates. This includes filing complete and accurate tax returns, paying taxes according to legal obligations, and maintaining appropriate documentation and accounting records.

The company seeks to comply not only with the letter of the law but also with its spirit and intent.



3.2 Responsible Tax Planning

The company conducts tax planning in a responsible and commercially justified manner. Tax structures must reflect the substance of the company's economic activities and must not be designed primarily to obtain artificial tax advantages.

3.3 Avoidance of Aggressive Tax Practices

The company does not engage in aggressive tax planning or arrangements intended primarily to obtain tax advantages inconsistent with applicable laws or internationally accepted standards.

3.4 Use of Jurisdictions and Corporate Structures

Corporate structures used by the company must be based on legitimate operational and commercial reasons. The company avoids the use of jurisdictions lacking transparency or associated with harmful tax practices unless there are clear operational and legal justifications.

3.5 Fair Use of Tax Incentives

The company may utilize tax incentives available under applicable laws where these are offered on fair and transparent terms and are consistent with responsible business conduct principles.

3.6 Transparency in Tax Reporting

The company maintains accurate records of its financial activities and tax contributions in all jurisdictions where it operates. The company aims to maintain transparency regarding economic activity, revenues, profits, and taxes paid to governments.

3.7 Responsible Use of Jurisdictions and Non-Use of Tax Havens

CENTUNION is committed to responsible tax conduct and to maintaining transparent and legitimate corporate structures in all jurisdictions in which it operates.

The company does not use tax havens or non-transparent jurisdictions for the purpose of avoiding or reducing tax obligations.

Legal entities within the group may only be established in jurisdictions where there is a genuine commercial, operational, or administrative purpose, such as project execution, financing, procurement, or regional management.



Avoidance of Non-Cooperative Jurisdictions

The company avoids establishing project structures, holding companies, or financing vehicles in jurisdictions that are internationally recognized as non-cooperative for tax purposes or that fail to meet accepted international transparency standards.

Compliance with International Transparency Standards

CENTUNION supports international efforts to improve tax transparency and combat illicit financial flows. Corporate structures and operations should be located in jurisdictions that comply with the standards of the OECD Global Forum on Transparency and Exchange of Information for Tax Purposes, including standards for exchange of information upon request and tax transparency.

Alignment with Responsible Tax Governance

The company ensures that jurisdictional choices are commercially justified, reflect genuine economic activity, and are not designed to artificially shift profits or erode tax bases. Corporate structures must remain transparent and understandable to tax authorities.

Monitoring and Compliance

The company periodically reviews its corporate structures and jurisdictional presence to ensure continued compliance with international transparency standards and responsible taxation principles.

4. Tax Governance

4.1 Board Oversight

The Board of Directors oversees the company's tax strategy and ensures that tax practices align with this policy and the company's governance standards.

4.2 Management Responsibility

The Chief Financial Officer or designated senior financial officer is responsible for implementing this policy, ensuring tax compliance, and supervising tax reporting and internal controls.

4.3 Internal Controls

The company maintains internal processes to ensure accurate tax accounting, compliance monitoring, and review of significant tax risks.



5. Tax Risk Management

The company manages tax risk through prudent governance and internal controls. Tax risks are evaluated in relation to legal compliance, financial exposure, reputational considerations, and alignment with corporate responsibility principles.

6. Relationships with Tax Authorities

The company seeks to maintain constructive and transparent relationships with tax authorities in the jurisdictions where it operates and commits to cooperation during audits or inquiries.

7. Responsible Partner Engagement

When entering into joint ventures or partnerships, the company encourages partners and contractors to adhere to similar standards of responsible tax conduct.

8. Monitoring and Implementation

Compliance with this policy is monitored through internal financial controls, periodic management reviews, and oversight by senior management and the Board of Directors.

9. Policy Review

This policy will be reviewed periodically to ensure alignment with changes in tax legislation, international best practices, and the company's corporate responsibility commitments.

10. Responsible Tax Conduct Commitment

Through this policy, CENTUNION reaffirms its commitment to responsible tax conduct, transparency, and compliance with applicable laws and international best practices. The Company conducts its tax affairs in accordance with the tax legislation, standards, and regulatory requirements of the jurisdictions in which it operates and implements projects, ensuring compliance with both the letter and the spirit of the law. Responsible taxation forms an integral part of the Company's broader commitment to ethical business conduct, sustainable development, and long-term value creation.

This policy will take effect upon its approval by the Compliance Officer. All employees and managers will be informed and will receive a copy of this policy for their compliance.