

ALANTRA

TAX POLICY, STRATEGY AND FUNCTION: ALANTRA GROUP

Date of approval	28 February 2024
Approved by	Board of Directors

ALANTRA

1. INTRODUCTION

In accordance with the provisions of article 249 bis and article 529 *ter* of Royal Legislative Decree 1/2010, of 2 July, approving the revised text of the Capital Companies Act (the "**Capital Companies Act**"), the Board of Directors of Alantra Partners, S.A. (the "**Company**" or "**Alantra**") is responsible for determining the Company's general policies and strategies and, in particular, for determining the risk control and management policy, including tax risks, as well as the determination of the tax strategy.

For the Board of Directors of Alantra, the definition of the framework and guiding principles of the tax strategy and governance of the Company and the other companies that comprise its group (the "**Alantra Group**" or the "**Group**") is a relevant objective. According to this objective, this tax policy ("**Tax Policy**" or the "**Policy**") is included in the list of corporate governance and regulatory compliance policies of the Alantra Group.

This Tax Policy has been approved by the Board of Directors of the Company at its meeting of 28 February 2024, following a proposal by the Audit and Risk Control Committee.

2. PURPOSE

The purpose of the Tax Policy is to set the principles and guidelines through which the Alantra Group establishes and develops its processes, protocols and lines of action in the field of taxation, and this by means of a structure of human and material resources, adequate and intended for such purpose (the "**Tax Function**").

The primary object of the Group's Tax Function is basically the control and management of the Group's tax affairs by means of (i) the knowledge of the tax obligations of the Group's companies, (ii) the establishment of processes that ensure due compliance with the applicable tax regulations, (iii) the control of significant risks and unnecessary conflicts, and (iv) an adequate coordination of the tax practices followed by the Group.

All of the above is framed within the commitment to apply good tax practices, to achieve the social interest and to act transparently, responsibly, efficiently and in line with a long-term corporate strategy that avoids tax risks and inefficiencies in the execution of the Group's business decisions.

3. SCOPE OF APPLICATION

This Tax Policy is of application to all applicable taxes to each of the companies that form part of the Alantra Group, in each of the countries and territories in which has presence, and in relation to all activities and businesses carried out by these companies.

4. PRINCIPLES AND GUIDELINES OF ACTION

The main principles and guidelines governing the tax affairs of the Alantra Group and the development of its Tax Function are the following:

ALANTRA

- ✓ **Compliance with the tax regulations in force** in the different countries and territories in which the Group's entities and companies operate, paying the taxes that are liable in accordance with the legal system.
- ✓ **Prevention and mitigation of significant tax risks**, ensuring that the taxation is appropriately related to the nature, structure and location of the economic activities carried out by each of the Group's entities.
- ✓ Adoption of the tax decisions of the Group's entities based on a **reasonable interpretation of the applicable regulations** and considering a close link with their business activities and seeking to avoid, on the basis of such interpretation, inefficiencies and undue tax costs for the Group.
- ✓ **Harmonisation and unification of the criteria** in tax matters among all Group's companies throughout the different jurisdictions and territories in which they operate, respecting in all cases coherence with each of the applicable regulations and with the different activities carried out.
- ✓ **Avoidance of certain actions**, such as carrying out transactions that only seek a tax advantage, the structuring of artificial transactions or transactions unrelated to the Group's own activity or the use of opaque structures whose sole purpose is to reduce the tax burden.
- ✓ Full **collaboration with the Tax Administration** in its tax audit activities, on the basis of respect for the law, reciprocity and good faith.
- ✓ **Fiscal transparency vis-à-vis third parties** (shareholders, customers, suppliers, employees, regulators, etc.) about the Group's principles of action concerning tax matters, on the bodies involved in the fiscal governance of itself and on the details of its tax contribution in the countries where it operates.
- ✓ Commitment to a **responsible tax contribution** towards social interest, favoring the configuration of a fair, sustainable and modern tax system, as well as the development and application of a more equitable and efficient tax legislation, for the simultaneous benefit of general and business interests.

5. TAX FUNCTION: STRUCTURE AND RESPONSIBILITIES

5.1. Structure

The establishment of a responsible and efficient tax strategy by the Group is based on the creation of a Tax Function tailored to the needs of the Group and each of its companies. The Tax Function has the mission to ensure and supervising the Group's compliance with its tax obligations, as well as preventing and reducing tax risks for the Group.

The design of the Tax Function should incorporate an appropriate structure of functions of the different roles of execution, control and supervision, together with the necessary allocation of responsibilities to each role, any of which can be covered internally or externally.

The current structure of the Group's Tax Function has the figure of a tax responsible who is part of the internal and centralised Tax Function, constituted by the Alantra's Tax Department, which is

ALANTRA

integrated within the Alantra Group's Corporate Services as an autonomous and independent department, reporting directly to the Group's Chief Financial Officer and Secretary General, in full collaboration and coordination with the other areas that comprise the Corporate Services, in particular with the Financial and Legal areas.

Alantra's Tax Department is made up of the professionals with expertise in the various tax disciplines that, from time to time, are entrusted with the responsibility for conducting the management of the tax matters of the different businesses and areas of the Group. The tax professionals integrated in the department are subject to the same remuneration policy as the rest of the employees of the Company. These professionals are subject to continuous training plans that enable them to consolidate and complete their professional skills and to keep fully updated on the Group's internal regulations and policies.

The Group's Tax Department relies on the assistance and advice of various law firms and firms specialised in tax matters in each of the markets in which the Group operates. In addition, for specific cases, in addition to this ongoing service, the Tax Function asks these or other specialist tax advisors for a second opinion (as a "*tax opinion*") on certain tax issues or aspects that could have an impact on the Group.

The head of the Tax Department shall hold regular meetings with the General Manager and the General Secretary and with members of the Finance Department and the Legal Department to report on and monitor relevant issues relating to the Tax Function and to adopt decisions, or proposals for decisions to the relevant corporate bodies, in relation to tax matters.

5.2. Responsibilities

The main responsibilities of the Group's Tax Function, under the principles and guidelines of this Tax Policy, consist of the following:

- Identification of each of the tax obligations to be met by all Group's entities in each of the relevant jurisdictions and territories.
- Creation, design and monitoring of the processes and procedures necessary for the proper compliance with the Group's tax obligations for the purposes of their identification, implementation, control and supervision, including, in particular, the recurring review of the SCIIF processes that refer to matters with tax implications, as well as the task management tools that the Group has established.
- Acting as liaison and centralised point of contact in the relations with external advisors and suppliers (including accounting services providers) in all what concerns the fulfilment of the Group's tax obligations or part of them.
- Control and supervision of each and every one of the different roles and responsibilities involved in any of the tax and tax compliance processes and procedures of the Group.
- Establishment of a system for managing and controlling the Group's tax risks, that are inherent to the Group's own tax obligations and which are determined by the structure of the Group,

ALANTRA

the businesses carried out, their economic relevance, their complexity and the presence of areas of uncertainty.

- Identification and analysis of potential tax benefits and other areas of tax optimisation that may be applicable to the Group, always within the applicable legal and interpretative framework.
- Centralisation, leadership and supervision of the submission and filing of all types of tax rulings and any other similar interpretative queries or criteria that may be requested or submitted to a tax administration by any of the Group's entities.
- Centralisation and leadership or supervision in all tax procedures in which any of the Group's entity is involved, as well as in interlocutions and relations with the various tax administrations in charge of managing and verifying the tax obligations of the entire Group.
- Support to the financial area in relation to tax aspects with an impact on the financial statements of the Group's entities and also the Alantra Group itself.
- Preparation and review of the tax aspects and comments included in the public financial statements of the Group's entities, the Group and the various subgroups included in the Alantra Group.
- Participation and active involvement in the design and execution of corporate development operations to be implemented by the Group, whether acquisitions, investments/divestments, restructurings, etc. The Tax Función will advise not only on the correct taxation and tax cost derived therefrom, but also in relation to alternative structures that may optimise taxation for the Group or, where appropriate, mitigate possible tax risks.
- Assistance to the legal, financial and business teams in the preparation of contractual documentation, specifically in relation to clauses with a tax impact, as well as in the negotiation with third parties of the same, whether between Group entities or with third parties, derived both from the Group's own operations and from the structure of the Group.

6. MONITORING AND CONTROL

The Company shall adopt the necessary and appropriate control mechanisms to ensure full compliance with tax regulations, within the framework of the above guidelines, by all the companies that make up the Alantra Group in all the territories and countries in which it operates.

The supervision of compliance with this Policy is the responsibility of the Company's Risk and Compliance Department.

The Board of Directors shall be promptly informed of the tax policies and criteria applied within the Group during each financial year and, in particular, of the degree of compliance with this Tax Policy.

7. PUBLICITY, DISSEMINATION AND UPDATE OF THE POLICY

The Board of Directors shall encourage monitoring of the objectives contained in this Tax Policy by the companies comprising the Group and its employees.

This Policy will be communicated and disseminated through the usual channels and will be available on Alantra's website. General responsibility for this Tax Policy lies with the Board of Directors, which, at its own initiative or at the proposal of the Audit and Risk Control Committee, may amend or update its content from time to time to reflect new approaches or regulatory changes or new tax rules.

Madrid, 28 February 2024