



CP ALL Public Company Limited

Tax Policy Announcement

Doc. No. SDD 100/2020

1) Principle

CP ALL Public Company Limited and all subsidiaries (“the Company”) recognized that “tax” is critical to sustainable development. It not only promotes and supports competitiveness of the business but also helps make socio-economic impacts as well as national development as a whole.

The Company is committed to tax management based on the principles of accuracy, transparency, and accountability for the highest benefits of the Company and all stakeholders. The practices of tax planning and implementation are in a consistent alignment within the Group.

The Group is managed and operates principally (more than 98%) in Thailand. There are no material revenues derived from, or assets located in, foreign countries.

2) Scope

The policy is applied to CP ALL Plc. and all subsidiaries.

3) Definition

- *The Company* means CP ALL Public Company Limited (CP ALL) and all subsidiaries.
- *Subsidiaries* means subsidiary company according to the Notification of the Securities and Exchange Commission (“SEC”).





4) Guideline

- With regards to taxation, the Company strictly complies with the revenue code and tax laws that are related to the Company's business operations with laws and regulations. The Company has tax consultants which comprises personnel with an expertise in supervising over strict compliance with laws and regulations.
- The Company has a Tax Accounting Department. It is responsible for following up with the government policy or initiatives that would lead to law enactment. Study the criteria for tax measures and tax privileges so as to keep abreast of the potential impacts to the Company. And notify the responsible person on the matters that would have impacts on the Company in order to prepare the Company for complying with the new law.
- The Company does not have policy to shift its profits to overseas subsidiaries where there is a low tax regime to avoid paying higher taxes in its home country.
- Transfer pricing for any intercompany transactions is based on the Arm's Length Principle, which is in compliance with the Thailand Revenue Code and any related tax laws.
- The Company will not misuse the tax structure in way that would encourage tax avoidance. Our business operation in Tax Havens is to improve the efficiency of business management, not for the purpose of tax avoidance.

The Tax Policy No. *SDD 010/2018* has been annulled. This new policy will be effective from 15 June 2020 onwards.

Announced on 1 June 2020.

